

IN THE UNITED STATES DISTRICT COURT

FOR THE SOUTHERN DISTRICT OF NEW YORK

D. GEORGE SWEIGERT

Plaintiff,

vs.

JASON GOODMAN,

Defendant

Case No.: 1:18-cv-08653-VEC-SDA

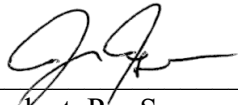
**DEFENDANT'S AMENDED ANSWER TO
SUPPLEMENTED SECOND AMENDED
COMPLAINT AND COUNTERCLAIM**

Defendant Jason Goodman Pro Se respectfully for his answer, alleges as follows on personal knowledge as to matters relating to them, and on information and belief as to all other matters.

I hereby attest that the pleadings herein are accurate and true under penalties of perjury. Further, I hereby attest that the attached exhibits are accurate and true copies of source documents as described.

Respectfully submitted

May 11, 2021



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ANSWER TO SUPPLEMENTED SECOND AMENDED COMPLAINT

1 The allegations of Paragraph 1 are partially admitted and partially denied.

2

3 Defendant admits to being a resident of New York and to operating social media accounts under

4 the name Crowdsourcethe Truth. However, persistent extrajudicial actions undertaken by the

5 Plaintiff have resulted in the termination of several of Defendant's social media accounts.

6 Specifically, Goodman's access to Facebook and all previous contents, images, video, messages,

7 comments including other social media accounts linked to Facebook such as Instagram, Oculus

8 and others have been terminated. Goodman's appeals to restore the social media accounts have

9 been denied. Goodman prays the court will find Plaintiff's ongoing extra judicial activities

10 constitute deliberate outside interference in this instant legal matter. Plaintiff's actions have

11 effectively destroyed elements of evidence that are in part the focus of interest in this legal

12 action. This effort serves to supersede the role of the court in deciding the outcome in these

13 controversies and has delivered the Plaintiff partial, instant relief for claims he has yet to prove.

14 Goodman hopes the court will find Plaintiff in contempt, in part for his actions to deliberately

15 cause third parties to destroy relevant evidence that could be used against him. Goodman's

16 Twitter linked video account on Periscope has also been terminated along with third party

17 comments and other relevant evidence. In addition to his excessive filings in this matter, Plaintiff

18 has engaged in a similarly energetic effort to file a litany of complaints and engage in additional

19 activities including publication of false and defamatory allegations as previously plead. Plaintiff

20 has also continued his persistent harassment of Defendant's service providers including Patreon

21 and their legal representatives. On January 10, 2021 Plaintiff sent an email to Colin Sullivan,

22 inside counsel for Patreon as well as numerous government officials and members of the press

23 including CNN and CBS news falsely alleging that Defendant "acted as an outside agitator at the

24 DEFENDANT'S AMENDED ANSWER TOSUPPLEMENTED SECOND AMENDED COMPLAINT AND

25 COUNTERCLAIM - 2

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1 recent breach of the U.S. Capitol”. This email included a “Draft Complaint” connected to a
2 threatened new action in United States District Court Northern District Oakland which at the
3 time of this writing remains unfiled. **(EXHIBIT A)** The complaint has not been filed and
4 therefore the Plaintiff should not enjoy immunity from the defamatory claims stated therein. In
5 today’s unprecedented “cancel culture” driven frenzy we hear daily news reports about people
6 losing their jobs, their reputations or being treated as guilty due to mere accusations. Plaintiff’s
7 objective is clear. These extrajudicial efforts aim to force the very relief he seeks in this legal
8 action. Plaintiff is determined to destroy Defendant’s ability to conduct business by any means
9 available to him, effectively attempting to sidestep any potential judgment of this court.
10
11

12 2. The allegations in Paragraph 2 are denied. Goodman is actually being sued
13 because the Plaintiff is a malicious and vexatious litigant working to suppress Defendant's first
14 amendment rights and to destroy his business, reputation and ability to earn money. Defendant
15 lacks sufficient knowledge to admit or deny musculoskeletal damage, but Plaintiff's own public
16 statements reveal a family history of medically diagnosed severe mental illness and indicate the
17 Plaintiff could pose a threat to himself, those around him and members of the general public
18 including the Defendant.
19

20 3. The allegations in Paragraph 3 are denied. Defendant has never knowingly
21 made a false statement of fact in any broadcast on Crowdsourcethe Truth. The statement
22 "continuous non-stop weekly broadcasts" as it pertains to the Plaintiff is absolutely false.
23 Goodman has produced over two thousand five hundred videos under the brand name
24 Crowdsourcethe Truth since its inception in 2016. As many as seven to ten broadcasts are
25 produced each week. Only a small number of these videos even mention the Plaintiff let alone
26 feature him, his likeness or any information related to him. This is demonstrated by the small
27
28 DEFENDANT’S AMENDED ANSWER TOSUPPLEMENTED SECOND AMENDED COMPLAINT AND
COUNTERCLAIM - 3

1 number of video examples offered in Plaintiff's numerous filings. It is materially misleading to
2 refer to the isolated selection of videos pertaining to Plaintiff as "continuous non-stop weekly"
3 broadcasts. Defendant would like to call the court's attention to Plaintiff's frequent reference to
4 Steele v Goodman, a similarly vexatious and frivolous lawsuit brought against Defendant by a
5 close associate of Plaintiff's brother, Robert David Steele. The court may recall Plaintiff has been
6 denied repeated attempts to intervene in Steele v Goodman. Defendant restates his allegation that
7 Plaintiff has collaborated directly or indirectly with third parties to facilitate additional lawsuits
8 against Defendant, including Steele v Goodman which was dismissed in September 2020.
9

10
11 4. Defendant admits that Plaintiff relies on his claims but denies the validity
12 of Plaintiff's claims. Additionally, regarding financial damages, Plaintiff has offered no evidence
13 of actual financial injury, only conclusory statements of expected or estimated financial injury
14 which are contradicted by his own public claims of being retired and receiving Military and or
15 other financial benefits leaving him with ample time to do nothing more than sue the Defendant
16 and waste valuable public resources including those of this honorable court.
17

18 5. The allegations of Paragraph 1 are partially admitted to and partially
19 denied. Defendant admits he is a limited purpose public figure because of his broadcasts on
20 YouTube and other social media channels. Goodman admits that these broadcasts have been
21 viewed by hundreds of thousands of viewers around the world and that he maintains his primary
22 business address in New York City. Goodman admits that he is being sued by Plaintiff, however
23 he denies making any false defamatory, slanderous or libelous statements targeted to destroy the
24 Plaintiff's career, profession or trade. Ironically, this is what the Plaintiff has repeatedly and
25 consistently attempted to do to Defendant.
26
27

1 6. The allegations in paragraph 6 are denied.

2
3 7. The allegations in paragraph 7 are partially admitted to and partially
4 denied. Goodman admits to being the CEO of Multimedia System Design, Inc. and admits the
5 corporate entity owns the Trademark Crowdsourcing the Truth. This trademark was sought after
6 agents and / or associates of the Plaintiff attempted to create hoax web pages using the
7 Tradename Crowdsourcing the Truth. Specifically, Manuel Chavez III posted a LinkedIn.com
8 profile page (since removed) using Crowdsourcing the Truth graphics and claiming he had been
9 hired by Crowdsourcing the Truth. After this hoax was perpetrated, Goodman sought a trademark
10 for the brand name.
11

12 8. The allegations in paragraph 8 are partially admitted and partially denied.
13 Defendant denies the designation "alt-right". This term has no legal or technical definition but is
14 an internet born colloquialism frequently used to describe supporters of Nazism, white
15 supremacy and the malicious online movement Q-anon among other objectionable things. As a
16 person of Jewish descent with relatives who specifically fled Europe during the rise of Nazism,
17 Defendant takes personal offense at this grotesque false statement from Plaintiff. Goodman is not
18 alt-right, has never supported Nazism, white supremacy or Q-anon and specifically denounces
19 and rejects each of these movements and political ideologies. This is yet another example of the
20 Plaintiff falsely ascribing statements or attributes to Defendant in his persistent malicious effort
21 to destroy Defendant's reputation and attempt to prejudice this court. Defendant denies being an
22 all-purpose public figure, this designation is generally reserved for people who are world
23 renowned such as Presidents, royalty or international celebrities. Defendant further denies
24 disseminating any malicious defamatory, slanderous or libelous material at any time. Defendant
25
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28 DEFENDANT'S AMENDED ANSWER TO SUPPLEMENTED SECOND AMENDED COMPLAINT AND
COUNTERCLAIM - 5

1 admits to operating the enumerated social media accounts with the exception of Facebook and its
2 related entities (Instagram, etc). Goodman's Facebook and related accounts were terminated on
3 or around October 2020. Based on his ongoing malicious activities, Defendant suspects this
4 termination was motivated by complaints and or false allegations from Plaintiff. Facebook has
5 offered no specific details as to why this account was terminated and no opportunity for appeal.
6 In a post on his SDNY.info blog, Plaintiff created a fraudulent headline claiming to expose a link
7 between Defendant Goodman and Q-anon even though no such link exists. **(EXHIBIT B)**.
8 There is not and has never been a link between Q anon and the Defendant, but with almost
9 clairvoyant prescience, the Plaintiff has attempted to create connections between Defendant and
10 this toxic hoax that now costs people their reputations and even their freedom. The coincidental
11 nature of Plaintiff's actions should not be ignored.
12

13
14 9. The allegations in paragraph 9 are denied. Defendant has never knowingly
15 made a false statement, has never knowingly deceived his audience or engaged in fraud.
16 Defendant specifically denies the claim of disseminating false narratives and reminds the court
17 that this description in fact matches Plaintiff's ongoing behavior.
18

19 10. The allegations in paragraph 10 are denied. This is further description of
20 Plaintiff's own actions. Plaintiff even references the hoax activities in the port of Charleston in
21 which his brother played the key role. Attached **(EXHIBIT C)** is a publicly released, redacted
22 version of an FBI official report into the events of June 14, 2017 at the Port of Charleston. The
23 report goes into extensive detail about Plaintiff's brother George Webb Sweigert and his arrest in
24 Zanesville Ohio after the incident. The report discusses the YouTube broadcast in question, but it
25 does not mention Goodman because the FBI knows as Defendant has stated, Goodman did
26 nothing wrong and acted only in good faith out of an abundance of caution. The publication
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28 DEFENDANT'S AMENDED ANSWER TOSUPPLEMENTED SECOND AMENDED COMPLAINT AND
COUNTERCLAIM - 6

1 referenced by Plaintiff is a self-published book authored by Plaintiff with the specific intent of
2 misrepresenting facts in the Port of Charleston matter.

3 11. The allegations in paragraph 11 are denied. The subscription numbers and
4 dollar amounts have been fabricated by Plaintiff with no actual source information beyond his
5 own guess. No donations are made to Crowdfunder the Truth, this wording implies a charitable
6 gift. Defendant sells sponsorships directly to viewers much as traditional news programs sell
7 sponsorships to corporate advertisers. By foregoing corporate advertising, Defendant has
8 upended traditional broadcasting business models and has enjoyed success with direct audience
9 sponsorship. These are sales, not donations. These funds allow Goodman to operate his business
10 which consists of producing and broadcasting news, information, opinion-based analysis and
11 entertainment in a similar fashion to traditional news broadcasters. Defendant again calls the
12 court's attention to Plaintiff's reliance on his own hoax activities (Port of Charleston) to disparage
13 Defendant. Whether Plaintiff planned this hoax, or opportunistically seized on it is irrelevant in
14 this context. Plaintiff perpetuates and uses the hoax to write a book and in the furtherance of his
15 efforts to destroy Defendant's reputation.

16 12. Defendant lacks sufficient information to admit or deny claims pertaining
17 to the specific credentials of the Plaintiff, however many of his public statements contradict the
18 claims of paragraph 12. Specifically, Plaintiff is not a private individual in the context of this
19 controversy, he is also a YouTube broadcaster, an attribute Plaintiff uses to claim Defendant IS a
20 public figure. It stands to reason if YouTube broadcasting makes Goodman a public figure, it
21 should do the same for Sweigert. Furthermore, Plaintiff is or at one time was a professional actor
22 who has appeared in movies and TV shows including Alex Jones InfoWars. These activities
23 would qualify Plaintiff as a limited purpose public figure in the same way they would Defendant.

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DEFENDANT'S AMENDED ANSWER TO SUPPLEMENTED SECOND AMENDED COMPLAINT AND
COUNTERCLAIM - 7

1 Plaintiff is also an author and would be considered a limited purpose public figure regarding
2 matters pertaining to ethical hacking, social engineering, and other subjects he has published
3 books on, including the bomb hoax incident in the Port of Charleston. It is noteworthy to observe
4 Plaintiff's books are self-published and his hacker guide has conspicuously become
5 "unavailable" during the course of this lawsuit. The Port of Charleston hoax book remains
6 readily available and itself contains more of the Plaintiff's totally fabricated accusations against
7 Defendant. Defendant denies the claim that Plaintiff's brother was ever his "roommate" or
8 "business partner". Webb was a house guest for a very limited period and participated in a
9 limited number of YouTube and other broadcasts with Defendant voluntarily. No official
10 relationship ever existed in the manner described by Plaintiff. Webb was never employed by
11 Goodman. Webb did not participate in any legally binding agreements with Goodman. Webb
12 was never Goodman's roommate. Webb was never Goodman's business partner. These claims are
13 further supported by Webb's testimony to FBI agents after his incarceration in Zanesville Ohio,
14 where he makes no claims whatsoever in support of these allegations. Webb told the FBI
15 specifically that he was employed by and working for US News Corp (sic). Goodman is aware
16 that U.S. News Corps is a fictitious entity and not an actual business or organization. On several
17 occasions, Goodman observed that Webb would use this claim to fool people into thinking he
18 was a legitimate news reporter. It is noteworthy but not surprising that Webb appears to have lied
19 to FBI agents during their investigation.

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21
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23
24 13. The allegations in paragraph 13 are denied. Defendant lacks sufficient
25 knowledge to confirm or deny Plaintiff's status as an Emergency Medical Technician however he
26 has provided no evidence of any such employment at present or historically and merely repeats
27 his claim.

28 DEFENDANT'S AMENDED ANSWER TO SUPPLEMENTED SECOND AMENDED COMPLAINT AND
COUNTERCLAIM - 8

1 14. The allegations in paragraph 14 are denied as an outright lie. Defendant
2 asks that Plaintiff be held in contempt of court for the deliberate and willful misrepresentation of
3 facts. Defendant could not possibly have behaved in the way Plaintiff describes because he was
4 not aware of Plaintiff at all until Plaintiff began making public video threats against Defendant.
5 These threats were brought to Goodman's attention via unsolicited emails from unknown viewers
6 of Goodman's program.
7

8 15. Defendant lacks sufficient knowledge to admit or deny the allegations in
9 paragraph 15.
10

11 16. Defendant denies allegations of "attacks" and lacks sufficient knowledge
12 to admit or deny the other claims of paragraph 16.
13

14 17. Defendant lacks sufficient knowledge to admit or deny the claims of
15 paragraph 17. Based on information and belief, Defendant accepted the statements by Webb
16 about his own brother as true. To the best of Defendant's recollection, no evidence to disprove
17 the veracity of the statements has been presented.
18

19 18. Defendant lacks sufficient knowledge to admit or deny the claims of
20 paragraph 18.
21

22 19. Defendant denies accusing Plaintiff of using his knowledge of PKI to
23 arrange for the death of New York fire fighters, U.S. military personnel, and other innocents
24 using his "hacking" skills to breach network security and commit criminal activity while
25 destroying "evidence". Although there is ample evidence of Plaintiff destroying evidence, the
26 editorialized approximate statements referenced in paragraph 19 were made by a third party and
27

1 in a speculative manner, acknowledging that activities of any hacker COULD result in
2 unanticipated consequences. Defendant lacks sufficient knowledge of Plaintiff's alleged
3 membership in any Bar Association or other associations to admit or deny.
4

5 20. Defendant denies the allegations in paragraph 20 which are themselves
6 ridiculous on their face. Defendant has virtually no knowledge of or information about the
7 Federal Bridge, except for information brought to him by third-party participants in his
8 broadcasts. David Hawkins, mentioned extensively in Plaintiff's pleadings, is another voluntary
9 participant in Goodman's broadcasts. Hawkins is not employed by Goodman and receives no
10 compensation from Goodman for his appearance on the show. Hawkins participates voluntarily
11 and is solely responsible for his own views, opinions, and statements. As Goodman understands
12 it, the Federal Bridge is a computer network, not dissimilar to the internet itself in concept,
13 interconnecting other computer networks. Defendant rejects the notion that criticism or
14 commentary about potential security lapses in a computer network could reasonably be construed
15 as an attack on the Plaintiff even if such statements had been made by the Defendant.
16
17

18 21. Defendant denies the allegations in paragraph 21. Goodman is free to
19 review, criticize and even condemn public works by authors should his opinion or observations
20 differ from that of the author. Nothing stated by Goodman was an "attack" as characterized by
21 Plaintiff.
22

23 22. Defendant denies the claims in paragraph 22. Sweigert's CV was
24 published online, press releases and other public documents revealed his previous employment.
25 Entrust is one of the entities on the Federal Bridge. Sweigert's aggressive, years long efforts to
26 destroy Goodman's ability to broadcast, viewed in juxtaposition with investigations into
27 computer networks that involved Sweigert's former employer is suggestive that Goodman's
28 DEFENDANT'S AMENDED ANSWER TOSUPPLEMENTED SECOND AMENDED COMPLAINT AND
COUNTERCLAIM - 10

1 reports may contain information unfavorable to Sweigert. These matters became topics of
2 discussion merely due to Sweigert's persistent interest in Goodman's activities and herculean
3 efforts to halt them. Given Sweigert was totally unknown to Goodman prior to broadcasting on
4 YouTube, the very fact that Sweigert had the level of interest that he does in these broadcasts
5 became a topic of interest in and of itself.
6

7 23. Defendant partially denies and partially admits the allegations in
8 paragraph 23. Defendant admits there were two active Federal Lawsuits against Goodman at the
9 time of the filing. Goodman alleges these were both brought about in a coordinated effort to
10 destroy him financially. Steele v Goodman (Case 3:17-cv-00601-MHL) was dismissed on
11 September 25, 2020. Sweigert made numerous attempts to intervene in Steele v Goodman all of
12 which were denied. In defiance of the Honorable M. Hannah Lauck's oral statements in the final
13 hearing, Steele v Goodman was refiled in a different division of Virginia's District court on
14 September 28, 2020. Sweigert sought leave of the court to intervene in that matter and was
15 denied on November 5, 2020. **(EXHIBIT D)** It is also noteworthy that Sweigert's brother Webb
16 introduced Goodman to Robert David Steele, Plaintiff in Steele v Goodman. The coordinated
17 effort alleged by Plaintiff in paragraph 23 was coordinated AGAINST Goodman, not by
18 Goodman. Defendant denies unauthorized use of likeness.
19
20

21 24. Defendant denies the allegations in paragraph 24
22

23 25. Defendant denies the allegations in paragraph 25
24

25 26. Defendant denies the allegations in paragraph 26. References to mental
26 illness, PTSD or other loathsome characteristics have been based on information and belief
27 learned from watching Plaintiff's own broadcasts in which he admits these things himself. These
28

1 opinions or statements are otherwise provided by or based on things said by family members or
2 close associates including Plaintiff's brothers. Defendant has no reason to believe these
3 individuals made false statements regarding specific claims.
4

5 27. Defendant denies the allegations in paragraph 27.

6 28. Defendant denies attempts to "mentally trigger" Plaintiff and lacks
7 sufficient knowledge to admit or deny the remaining claims of paragraph 28.

8 69. Defendant denies the allegations in paragraph 69.
9

10 70. Defendant denies the allegations in paragraph 70.

11 71. Defendant denies the allegations in paragraph 71.

12 72. The allegations in paragraph 72 pertain to statements made by Hawkins.

13 Defendant is described as laughing at the statement which cannot in and of itself be
14 construed as inherently libelous or slanderous. Hawkins is not named as a party in this
15 suit. Goodman denies responsibility for statements made by third party participants on
16 Crowdsourcethe Truth and is specifically protected from civil actions based on such
17 statements pursuant to 47 USC – § 230.
18

19 73. Defendant denies the allegations in paragraph 73.
20

21 74. Defendant admits to making the statement in paragraph 74.

22 75. Paragraph 75 pertains to a statement made by Hawkins, Defendant denies
23 responsibility for statements made by third parties pursuant to 47 USC – § 230.
24

25 76. Defendant denies the use of any "smear technique" as characterized in paragraph

26 76.
27

1 77. Defendant admits to making the statement in paragraph 77.

2 78. Defendant admits to making the statements in paragraph 78 in which he
3 speculates about a hypothetical situation in which Plaintiff might have been employed as
4 an ethical hacker.
5

6 79. Defendant denies responsibility for statements of opinion made by third parties
7 pursuant to 47 USC § 230.
8

9 80. Defendant denies responsibility for statements of opinion made by third parties
10 pursuant to 47 USC § 230.

11 81. Defendant denies the allegations in paragraph 81

12 82. Defendant lacks sufficient knowledge to admit or deny the allegations in
13 paragraph 82.
14

15 83. To the best of Defendant's understanding, paragraph 83 pertains solely to
16 statements and internet posts made by Hawkins. Defendant denies responsibility for
17 actions of third parties pursuant to 47 USC § 230 and common sense. Goodman denies
18 responsibility for the actions of Hawkins. Goodman denies allegations of pre-scripted
19 broadcasts.
20

21 84. Defendant does not understand the allegations as stated in paragraph 84 and
22 cannot admit or deny.
23

24 85. Defendant denies responsibility for statements made by third parties pursuant to
25 47 USC § 230.
26

27 86. Defendant denies the allegations of paragraph 86.

87. Defendant denies the allegations of paragraph 87.

88. Defendant admits that Plaintiff repeats his allegations

89. Defendant admits the described broadcasts originated from New York.

90. Defendant denies the allegations of paragraph 90.

91. Defendant admits to having incorporated political cartoons into items that were offered for sale on Redbubble.com. The newsworthiness is determined by the content of the broadcasts and the photorealistic digitally created political cartoons are elements of the news broadcasts. The political cartoons are a fair use of Plaintiff's likeness pursuant to the newsworthiness exception. The transformative nature of the use of portions of Plaintiff's likeness is allowed and the newly resultant image is the intellectual property of the Defendant who is free to commercialize it as he sees fit. It is worth mentioning, on or about November 28, 2018 possibly due to his dissatisfaction with this court's ability to resolve this dispute in his favor, Sweigert took the extrajudicial step of misrepresenting facts in a complaint made with Redbubble.com. The artwork in question was removed by Redbubble.com perhaps due to their desire to avoid entanglement in legal action as threatened by Sweigert. Despite the unresolved legal dispute, Goodman sent a counterclaim to Redbubble.com (**EXHIBIT E**) which was denied. Sweigert has demonstrated a pattern and practice of seeking extrajudicial relief for the precise matters at controversy in this legal action. In doing this, Plaintiff brazenly defies this honorable court's authority to resolve this dispute in the interest of justice.

92. Defendant denies the allegations of paragraph 92.

1 93. Defendant admits that Sweigert has not given written permission to use his
2 likeness, but this is irrelevant pursuant to the broad newsworthiness exception in NYCRL
3 § 51.
4

5 94. Defendant lacks sufficient knowledge to admit or deny the claim in paragraph 94.
6

7 95. Defendant admits that the newsworthiness of Plaintiff's actions allows the use of
8 his name and likeness in broadcasts about those actions without his written consent.
9 Artwork or other content created for news broadcasts including images and commentary
10 pertaining to the broadcasts are the intellectual property of the Defendant to do with as he
11 chooses.
12

13 96. Defendant denies creating a playlist called "Jason Goodman & David Hawkins"
14 as described in paragraph 96. The examples provided by Plaintiff show the playlist bears
15 the name "Bella Meya" this is an entity unknown to Defendant but presumed to be a
16 YouTube viewer. Defendant denies responsibility for the actions of unknown third
17 parties.
18

19 97. Defendant denies the allegations of paragraph 97.
20

21 98. Defendant denies the allegations of paragraph 98, any use of Plaintiff's name or
22 likeness is a fair use and newsworthy based on Plaintiff's actions in the public domain,
23 including his ongoing abuse of the civil justice system.
24

25 99. Defendant denies the allegations of paragraph 99.
26

27 100. Defendant denies the allegations of paragraph 100 and specifically cites this
28 allegation as absurd. It is obvious to any reasonable observer that content containing

reference to or likenesses of the Plaintiff makes up only a small fraction of the total library of content created by Defendant making this allegation implausible on its face.

101. Defendant denies the allegations of paragraph 101 as being additionally absurd for the same reasons as 100.

102. Defendant denies the allegations of paragraph 102. Images used on Redbubble were the rightful intellectual property of Defendant, have been removed more than two years ago after a total of six sales resulting in less than \$20 in profit. **(EXHIBIT F)**

103. Defendant denies the allegations of paragraph 103 but would like to bring the court's attention to Plaintiff's mention of Periscope here in this paragraph, notably absent from other mentions. This account was recently terminated, on information and belief Defendant alleges this was a result of extrajudicial activity by Plaintiff. Periscope has refused to provide any details or entertain any appeal to this action.

104. Defendant partially admits and partially denies the allegations of paragraph 104. Plaintiff is not used for advertising, his image and likeness were used in stories where his activities are deemed newsworthy such as abuse of the civil justice system and public dissemination of lies about the Defendant, including incitements to violence against Defendant as previously plead.

105. Defendant lacks sufficient knowledge to admit or deny the allegations in paragraph 105.

106. Defendant denies the allegations of paragraph 106.

107. Defendant denies the allegations of paragraph 107.

108. Defendant lacks sufficient knowledge to admit or deny allegations in paragraph

108 but draws the court's attention to Plaintiff's reference to "both defendants". Plaintiff

1 clearly recognizes that Hawkins is an entity separate from Goodman and imagines him to
2 be a Defendant however only one Defendant is named in this action and it is not
3 Hawkins.
4

5 109. Defendant denies the allegations of paragraph 109.
6

7 110. Defendant denies the allegations of paragraph 110.
8

9 123. Defendant lacks sufficient knowledge to admit or deny the allegations in
10 paragraph 123 and Plaintiff has failed to provide any evidence of alleged damages.
11

12 125. Defendant lacks sufficient knowledge to admit or deny the allegations in
13 paragraph 123 and Plaintiff has failed to provide any evidence of alleged damages.
14

15 126. Defendant denies the allegations in paragraph 126.
16

17 127. Defendant denies the allegations in paragraph 127.
18

19 128. Defendant denies the allegations in paragraph 128.
20

21 129. Defendant lacks sufficient knowledge to admit or deny the allegations in
22 paragraph 129 and asks the court to take notice that Plaintiff has repeatedly failed to
23 provide any evidence of alleged injuries.
24

25 130. Defendant lacks sufficient knowledge to admit or deny the allegations in
26 paragraph 130 and has no recollection of uttering the specific quoted statement. No
27 reference to the origin of the alleged quote is provided by Plaintiff. Plaintiff made
28 numerous broadcasts in which he described himself as an "apathetic CIA troll" or similar
language to the best of Defendant's recollection. This was understood by Defendant to be
an admission by Plaintiff of his affiliation with the CIA as ridiculous as it would seem.

1 131. The allegations in paragraph 131 lack sufficient specificity for Defendant to admit
2 or deny.

3 132. Defendant admits that Plaintiff denies his own allegations of paragraph 131.

4 133. Defendant lacks sufficient knowledge to admit or deny the allegations in
5 paragraph 133.
6

7 **ANSWERS TO SUPPLEMENTAL COMPLAINT**

8
9 1. Defendant denies that Plaintiff's complaint provides a factual background. The
10 majority of it is pure fabrication.

11 39. Defendant denies the allegations in paragraph 39.

12 40. Defendant denies the allegations in paragraph 40.

13 41. Defendant denies the allegations in paragraph 41. Defendant would like to advise the
14 court that each of the referenced tweets were made in response to Plaintiff's
15 unmotivated publication of false statements about Defendant on his SDNY.info blog
16 similar to false statements from that blog as previously referenced in these pleadings
17 and presented to NYPD. By eliminating his antagonistic tweets from his pleadings
18 and selectively presenting elements of evidence Plaintiff attempts to materially
19 misrepresent the context in which any responses from Defendant were provoked.
20

21 42. Defendant admits that to the best of his limited legal knowledge, Plaintiff has
22 accurately quoted New York laws in paragraph 42 and denies making any false
23 statements.
24

25 43. Defendant denies the allegations in paragraph 43.

26 44. Defendant denies the allegations in paragraph 44.
27

1 45. Defendant denies the allegations in paragraph 45.

2 47. Defendant denies the allegations in paragraph 47.

3 48. Defendant denies the allegations in paragraph 48.

4
5 49. Defendant admits that to the best of his limited legal knowledge, Plaintiff has
6 accurately described New York Civil Rights Law § 50 and 51.

7 50. Defendant denies the allegations in paragraph 50.

8
9 **FIRST COUNTERCLAIM**

10 **Violation of the New York Anti-SLAPP Law**

11 51. Paragraphs 1-50 are incorporated by reference.

12 52. Plaintiff Sweigert violated New York's Anti-SLAPP law by commencing or
13 continuing the litigation of this matter. See N.Y. Civ. Rights Law § 70-a, 76-a and
14 N.Y. C.P.L.R. § 3211(g), 3212(h).

15
16 53. New York's anti-SLAPP law was substantially amended effective November 10,
17 2020.

18 54. The newly amended anti-SLAPP law extends far more broadly than the previous
19 version, extending to lawsuits based upon "any communication in a public place open
20 to the public or a public forum in connection with an issue of public interest" or based
21 upon "any other lawful conduct in furtherance of the exercise of the constitutional
22 right of free speech in connection with an issue of public interest."

23
24 55. Because the statute also states that "public interest" should be "construed broadly and
25 shall mean any subject other than a purely private matter," the new anti-SLAPP law
26

1 should be construed to sweep up political and social discussions, as well as
2 entertainment productions.

3 56. Sweigert commenced and continued the above-captioned lawsuit, including his
4 defamation claim, against Defendant specifically for his commentary about Sweigert
5 a self-described expert in the fields of "ethical" hacking and social engineering, as
6 well as other matters of public interest.
7

8 57. Defendant's news outlet Crowdsourcethe Truth routinely criticizes officially accepted
9 "narratives" and investigates the methods and systems that lie beneath the surface.
10

11 58. By authoring the book, *Ethical Hacker's Field Operations Guide: Learning the Art of*
12 *Penetration Testing* Sweigert has thrust himself into the public debate regarding
13 hacking and social engineering and has opened himself to scrutiny and criticism.
14

15 59. Sweigert commenced and continued his legal action against Goodman as retribution
16 for Defendant raising questions about Sweigert and his public activities, specifically
17 concerning ethical hacking and social engineering.

18 60. Plaintiff's defamation lawsuit is based upon "communication in a public place open
19 to the public or a public forum in connection with an issue of public interest" and is
20 further based upon " other lawful conduct in furtherance of the exercise of the
21 constitutional right of free speech in connection with an issue of public interest"
22

23 61. Sweigert's lawsuit was commenced and continued without a substantial basis in fact
24 and law and could not be supported by a substantial argument for the extension,
25 modification or reversal of existing law.
26
27

62. Sweigert's lawsuit was commenced and continued for the sole purpose of harassing, intimidating, punishing and otherwise maliciously inhibiting the free exercise of speech, petition and association of Defendant's rights.

63. Sweigert is liable to Goodman for costs, compensatory damages, and punitive damages, and such other relief as may be allowed by law and the court deems appropriate.

PRAYER FOR RELIEF

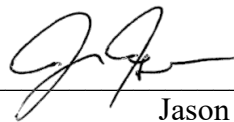
WHEREFORE, Defendant Jason Goodman respectfully requests that the Court award the following relief:

- A. A declaration that Mr. Goodman made no defamatory statements about Mr. Sweigert.
- B. A declaration that Mr. Sweigert commenced or continued this lawsuit without a substantial basis in fact and law, and that cannot be supported by a substantial argument for the extension, modification or reversal of existing law.
- C. An award of compensatory, punitive damages, as well as an award of fees, costs and disbursements.
- D. A declaration that the dismissal of Sweigert's defamation claim is deemed to be a full and final adjudication on the merits of all claims that Sweigert asserted against Defendant or could have asserted as of the date of the entry of judgment.

- 1 E. A declaration that Sweigert is a vexatious litigant, together with an order that
2 Sweigert make a showing of good cause before commencing another pro se action
3 in this Court. See Ajamian v. Nimeh, No. 1:14-CV-0320 GTS/CFH, 2014 WL
4 6078425, at *3 (N.D.N.Y. Nov. 13, 2014)
5
6
7 F. A declaration that Sweigert's bad faith, frequent address changes and abuse of
8 process constitute a deliberate fraud on this court.
9
10 G. Such other and further relief as the Court may deem just and proper.
11
12
13

14 Respectfully submitted

15 May 11, 2021
16
17

18 

19 Jason Goodman, Defendant, Pro Se
20 252 7th Avenue Apt 6s
21 New York, NY 10001
22 (323) 744-7594

truth@crowdsourcethetruth.org

(EXHIBIT A)

From: **Spoliation Notice** spoliation-notice@mailbox.org
Subject: Re: Complaint to Human Rights Commission <- Corrected
Date: January 10, 2021 at 3:27 PM

To: disable@patreon.com, mullane.ahern@sfgov.org, legal@patreon.com, colin@patreon.com, donieosullivan@protonmail.com, donie.osullivan@turner.com, georg.webb@gmail.com, jason@21stcentury3d.com, jasongoodman72@protonmail.com, truth@crowdsourcethetruth.org, metro@sfchronicle.com, newstips@nbc11.com, ilelchuck@sfchronicle.com
Cc: press@indexventures.com, sfcitypartnersupport@sfgov.org, feedback@calbar.ca.gov, lawenforcement@paypal.com, sheryl.cowan@sfgov.org, legal@support.youtube.com, info@privacyrights.org, ahern@sfgov.org, dosw@sfgov.org, legal@indexventures.com, sinead@indexventures.com, hrc.info@sfgov.org, privacy@patreon.com, subscriptions@thr.com, crime@mercurynews.com, themerc@bayareanewsgroup.com, legals@mercurynews.com, aruggiero@bayareanewsgroup.com, investigates@cbsnews.com, kev@cbsnews.com, HartT@cbsnews.com

To: Donie O'Sullivan, CNN

Dear Sir,

Millions of people have enjoyed your CNN news stories about George Webb Sweigert and Jason Goodman, both alleged to be pro-Trump militant extremists.

It may interest you that the apparent financial facilitator of these extremists is a San Francisco based company known as PATREON, which is being sued as demonstrated by the attached DRAFT complaint.

As you may know, both "George Webb" and Jason Goodman were on hand at the terrorist penetration of the U.S. Capitol to support the alleged assault.

A courtesy copy of the DRAFT complaint is provided as a litigation privilege to Jason Goodman and the legal staff at PATREON. Either party is free to provide a critique of this DRAFT complaint.

This may make another interesting news article for CNN.

Best,

D. George Sweigert

On 05/30/2018 11:42 PM Spoliation Notice <spoliation-notice@mailbox.org> wrote:

To: HRC

Attached is a corrected version of the Complaint.

Warm regards,

Evidence Collection Team

On May 30, 2018 at 7:57 PM Spoliation Notice <spoliation-notice@mailbox.org> wrote:

To: General Counsel, Patreon, Inc.

Colin:

Please see attached complaint.

Warm Regards

Evidence Collection Team

On November 29, 2017 at 7:15 PM Spoliation Notice <spoliation-notice@mailbox.org> wrote:

To:
 Colin Sullivan
 Bar no. 285202

Bar No. 209200
General Counsel
Patreon, Inc.

Dear Sir,

This notice requests that you begin the process of a litigation hold on all electronic evidence stored, processed or transmitted by your organization for the following account:

crowdsourcethetruth

The operator of this account is a defendant in a federal lawsuit:

Jason Goodman

This request is an evidence preservation request to prevent spoliation of electronic evidence that will be sought in federal litigation (please consult Federal Rules of Civil Procedure for guidance).

Mr. Goodman is a defendant to allegations that concern public doxing, copyright violations, harassment and hate speech. All which appear to violate the community standards policy of Patreon.

Recently, Mr. Goodman has allegedly published a series of videos on your platform that attack the privacy, physical characteristics, and intelligence of private citizens in the State of California that Mr. Goodman perceives may be friends of the plaintiff in this federal lawsuit.

Therefore, as your company holds this evidence, and as it will be required to be admitted into the court record, a strong request is hereby made that you preserve this evidence (account application, invoices, payments, video content, records of messages, transactions with Mr. Goodman, etc.).

As many of these actions allegedly violate California privacy laws, there is an increased duty to preserve these records as follow-up complaints shall be lodged with the California Attorney General with a copy of this notification.

If your organization allows this behavior to persist, serious consideration will be given to adding Patreon as a co-defendant in this federal litigation -- as your company will only be aiding in the distribution of the offense material.

This is a very serious matter as law enforcement has become involved.

Thank you.

Evidence Collection Team



draft-complaint
- Copy.pdf

1 D. GEORGE SWEIGERT
2 c/o GENERAL DELIVERY
3 MOUNT SHASTA, CA 96067
4 Spoliation-notice@Mailbox.org

5 **UNITED STATES DISTRICT COURT**
6 **NORTHERN DISTRICT**
7 **OAKLAND**

8 **D. GEORGE SWEIGERT,**
9 **Plaintiff,**

Case No.:

10 **vs.**

COMPLAINT FOR DAMAGES AND
INJUNCTIVE RELIEF TRUST

11 **MULTIMEDIA SYSTEMS DESIGN, INC.,**
12 **A NEW YORK STATE CORPORATION**
13 **DBA CROWDSOURCE THE TRUTH,**
14 **DBA 21ST CENTURY 3D,**
15 **PATREON, INC.,**
16 **A DELAWARE STATE CORPORATION**

17 **Defendants**

18 Pro se non-attorney Plaintiff D. George Sweigert (herein the “Plaintiff”) alleges as
19 follows:

20 **SUMMARY OF ACTION**

21 1. Plaintiff is a U.S. Air Force veteran, licensed Emergency Medical Technician in
22 Alameda County, a former member of the Livermore-Pleasanton Community Emergency
23 Response Team (LPCERT), a 2018 graduate of Las Positas College (LPC), with honors, with a
24 degree in Network Security, attended LPC under a Veterans Educational Assistance Program,
25 and became a Certified Ethical Hacker (based upon LPC training) and a California Emergency
26 Management Specialist as certified by the Governor’s Office of Emergency Services (CalOES).
27
28

COMPLAINT FOR DAMAGES AND INJUNCTIVE RELIEF TRUST - 1

1 The Plaintiff has self-published a dozen white papers on cyber security of critical infrastructure
2 as well as the book “Certified Ethical Hackers Field Operations Guide”.

3 2. The Plaintiff owns certain of the intellectual property rights, including all rights of
4 publicity, or and associated with the Plaintiff’s education, career reputation and professional
5 persona. The Plaintiff has published numerous white papers, articles and treatises on ethical
6 hacking, network security, emergency management, protection of critical infrastructure, etc.
7

8 3. The Plaintiff’s name, photograph and likeness have tremendous value, in
9 particular to the industries associated with cyber security infrastructure protection aka “network
10 security”.

11 4. Plaintiff brings this action against a social media business that operates a
12 humilitainment network known as CrowdSource The Truth (CSTT) hosted on YouTube.com
13 (YouTube, LLC) and Patreon.com (PATREON, INC.). The corporate entity that owns the
14 trademark for CrowdSource The Truth is a New York State chartered corporation known as
15 Multimedia Systems Design, Inc. (MSDI). The C.E.O. of M.S.D.I. is Jason Goodman of New
16 York City and is presently a defednat in a federal action for defamation brought by this Plaintiff.
17

18 5. “Humiltainment” describes public smear campaigns, publication of private facts,
19 “doxing”, deployment of law enforcement to an individual’s home for a “wellness check”,
20 telephoning an individual’s work place to create office embarrassments and employment
21 terminations, telephoning unlisted telephone numbers to record conversations (unknown to the
22 receiver of the call) for broadcast on social media networks YouTube and Patreon.
23

24 6. The Plaintiff brings this action in California to pursue his common law rights to
25 privacy and control of his publicity, as well as the statutory rights created by California Civil
26 Code of § 3344.
27

1 7. The claims presented herein will demonstrate that MSDI, that maintains well over
2 13 social media properties (footprint), operates a profit-driven commercial “humilitainment”
3 network designed to create debilitating humiliation in CrowdSource targets and entities (like the
4 Plaintiff) to settle scores and personal grievances of the CEO. The web-site for this tradename is
5 CROWDSOURCETHETRUTH.ORG.
6

7 8. The CEO is a former “3-D cameraman” who was employed in the production of
8 feature length films in Hollywood, California – see the “X-Men”. While in California (from
9 approximately 2005 to 2016) the CEO of the Defendant corporation (MSDI) established business
10 operations for several ventures related to MSDI. This included the operation of a MSDI
11 subsidiary known as “21st Century 3D” (21C3D), which published business addresses on public
12 Internet websites for both MSDI and 21C3D in Hollywood, California during this period (2005
13 to 2016). Supposedly this CEO was good friends with Brian Singer, the producer of “The X-
14 Men”.
15
16

17 **JURISDICTION AND VENUE**

18 9. Pursuant to California’s Code of Civil Procedure (C.C.P.) §§ 395 and 395.5,
19 jurisdiction is proper in California because the harms and obligations alleged herein occurred in
20 this judicial district, and the amount of Plaintiff’s damages exceeds the jurisdictional limit of this
21 Court (the amount of damages exceeds \$75,000.01). Jurisdiction is also based upon diversity of
22 parties.
23

24 10. This Court has personal jurisdiction over Defendants pursuant to Code of Civil
25 Procedure § 410.10. Defendants have manifested the malicious intent to target Plaintiff and his
26 family in this jurisdiction with humilitainment torts. Therefore, Plaintiff and his family was
27 directly impacted and injured by Defendants’ wrongful actions in Alameda County.
28

1 11. Venue is proper before this Court because, inter alia, Defendants reside and/or do
2 business in California, and/or each of the acts, events, occurrences, or transactions referred to
3 herein occurred in California, and/or had the proximate effect of causing damages to Plaintiff
4 therein.
5

6 12. MSDI has operated a “DBA” in both New York and California known as “21st
7 CENTURY 3D” (21C3D). MSDI, as the operator of CrowdSource The Truth, maintains social
8 media accounts via the network communications servers located within this Court’s jurisdiction
9 at YouTube, LLC, a subsidiary of Google, LLC in Oakland, California and at PATREON, INC.
10 A paywall hosting service in San Francisco, California. Both YouTube/Google and PATEON
11 hosts social media podcasts available to the general public over the Interstate wires of the public
12 Internet service. Both YouTube and Patreon have received at least two dozen warnings from the
13 Plaintiff requesting deletion of video podcast content that violates the aforementioned California
14 statutes.
15

16 13. Organizations outside of California are subject to tort liability in California when
17 an intentional act that is likely to cause harm in California and is aimed at California. During the
18 entire time of the tortious conduct described the Defendants directed such acts at the Plaintiff as
19 he resided in California.
20

21 14. California Civil Code of § 3344 and Code of Civil Procedure § 410.10 confer
22 jurisdiction, the claims alleged herein are within this time period of the statute of limitations.
23 California has a two-year statute of limitations for “right of publicity” claims (California Civil
24 Code of § 3344) while New York only allows a one-year limit. New York State does not
25 recognize a common law right to publicity or privacy, but instead has only created a statutory
26 right of privacy as codified in New York Civil Rights Law §§ 50, 51 (NYCRL §§ 50, 51). There
27
28

1 is no duplication of claims with this action and any pending federal action in the New York
2 against the natural person Jason Goodman.

3 15. Further, New York State does not recognize an action for the public disclosure of
4 private facts that would tend to embarrass and humiliate the target, unlike California. California
5 typically has a statute of limitations of one year, from the date of disclosure, to file a claim of
6 private disclosure of public fact claim, the claims alleges herein are within this time period.
7

8 **PARTIES**

9 ***DEFENDANTS***

10 **16. MSDI and 21C3D.** A more complete description of MSDI has been provided in
11 EXHIBIT ONE. Suffice that it is a New York State chartered corporation that has listed the CEO,
12 known as “Jason Goodman”, and operates other affiliates such as 21C3D. As stated on a public
13 website, 21C3D maintains offices in New York and Los Angeles (21C3D 505 8th Avenue, New
14 York, N.Y. 10018 and 3450 Cahuenga Blvd, West, Los Angeles, California 90068 (see “21st
15 Century 3D is a full-service stereoscopic 3D motion picture production company with offices
16 in New York City and Los Angeles.”)).
17

18 17. The Plaintiff is presently suing the CEO of MDSI in the U.S. District Court for
19 the Southern District of New York (S.D.N.Y.). The National Academy of Television Arts and
20 Sciences (NATAS), organizer of the “EMMY” Awards, is also suing MDSI in the S.D.N.Y. for
21 trademark infringement. (*The National Academy of Television Arts and Sciences, Inc. et al v.*
22 *Multimedia System Design, Inc.*, 1:20-cv-07269-VEC). Both S.D.N.Y. lawsuits have a common
23 federal judge – Hon. Valerie E. Caproni.
24

25 18. The CEO (Jason Goodman) is a pro-Trump, alt-right political figure who, as of
26 late, has taken to maintaining alliances with individuals tracked by the Southern Poverty Law
27
28

Center (S.P.L.C.) HATE WATCH, to include: Laura Loomer, a pro-Trump one time candidate for Congresswoman in South Florida, Larry Klayman, esq. a pro-Trump attorney who had his law license revoked for two months by the District of Columbia Bar Association, and “Dr.” Jeromer Corsi, PhD, a former pro-Trump suspect in the Robert S. Mueller, II special council investigation. Messrs Klayman, Corsi and CEO Goodman held a series of on-line podcasts entitled “Citizen’s Grand Jury” to issue indictment papers against Robert S. Mueller, III.

19. On several occasions MSDI / 21C3D CEO Goodman has appeared on the conspiracy channel, hosted by Alex Jones, known as “INFOWARS”. Likewise, Mr. Jones has appeared on the MSDI / 21C3D podcast known as “CrowdSourceThe Truth” channels 2 and 3 on YouTube.COM.

20. Using MSDI and 21C3D social media properties to “livestream” his inflammatory video podcasts, this “CEO” acted as an outside agitator at the recent breach of the U.S. Capitol on January 6, 2021. In April 2020 the social media platform FACEBOOK terminated the account of the CEO for the video podcast that was hoax peddling conspiracy theories about the COVID-19 corona virus.

21. The CROWDSOURCETHETRUTH.ORG website contains the phrase “Sponsorship By Mail : 21st Century 3D, 252 7th Avenue, New York, N.Y. 10001” (home address for Jason Goodman). The e-mail address provided is: truth@crowdsourcethetruth.org . The Internet domain 21STCENTURY3D.COM shows registration information as belonging to: jason@21stcentury3d.com.

22. In related S.D.N.Y. litigation Jason Goodman has listed his telephone number as 323-744-7594, a Los Angeles prefix (*Sweigert v. Goodman*, 1:18-cv-08653-VEC-SDA). The Plaintiff’s lawsuit against the CEO of MDSI sues him personally as a natural person.

1 23. The CEO has gone as far as telephoning ambulance and emergency medical
2 service providers in the City of Mount Shasta, California to allege that the Plaintiff was under
3 investigation by the F.B.I.. These telephone calls were designed for the purposes of damaging
4 the long-term career opportunities of the Plaintiff (April 2018, see EXHIBIT ONE).

5
6 24. The CEO maintained a close relationship with “George Webb” who was recently
7 featured on the C.B.S. News program “Sixty Minutes”, which aired 01/03/2021, entitled “*What*
8 *is Section 230 and why do people want it repealed?*”. George Webb and the CEO were
9 responsible for creating unnecessary public panic on June 14th, 2017 when their YouTube
10 podcast led to the emergency evacuation of the Port of Charleston, South Carolina, aka the “Port
11 of Charleston dirty bomb hoax”. “60 Minutes” used the term “hoax peddler” to describe George
12 Webb, which is a term that could be applied to the CEO of the Defendants.

13
14 25. The CEO has also featured discredited anti-COVID-19 conspiracy theorists (such
15 as Judy Mikovits), pro-Trump election fraud litigator Sidney Powell, esq., and other pro-General
16 Michael Flynn (U.S.A., retired) and so-called “F.B.I. whistle-blower” Robyn Gritz, all of whom
17 have recently had their “TWITTER” accounts permanently suspended. Powell and Gritz and
18 other pro-Trump affiliates have appeared countless times on “CrowdSource The Truth” podcasts.
19 The CEO has also been closely aligned with militant extremists involved in the armed Cliven L.
20 Bundy Ranch stand-off near Las Vegas, Nevada and the armed Bundy stand-off in Southeastern
21 Oregon.
22

23
24 **26. PATREON, INC.** Defendant Patreon, Inc. is, upon information and belief, a
25 Delaware corporation having a principal place of business and regular and established place of
26 business at 230 9th Street, San Francisco, California 94103. Patreon is a membership platform
27 that helps artists and creators get paid by their fans. Since being founded in 2013, Patreon has
28

1 sent over \$1 billion in payments to over 150,000 creators. On information and belief, Defendant
2 has operated a website located at **patreon.com**.

3 27. On information and belief, Defendant PATREON's web servers utilize a system
4 of notifications and authorizations to control the distribution of content, e.g., what webpage
5 content may be served from web servers and intermediate caches and what cached webpage
6 content a browser is re-authorized to use to render Defendant's webpage(s).

7
8 28. PATREON is an online platform that allows individuals to set up a web page for
9 their creations. The creator of the page can then charge each "patron" a fee (or "pledge") to
10 access said creations (e.g. a monthly fee of \$5.00 for access to the creator's podcast.) In addition
11 to this fee, creators can charge additional fees (or "pledges"), whereby their "patrons" may pay
12 additional fees to access other content, such as: an extra podcast, or merchandise.

13
14 29. In sum, PATREON offers a monthly credit card subscription to the general public
15 for individual content providers (like CrowdSource The Truth). This utility acts as a "pay-wall",
16 that is PATREON redirects video podcast content to the subscriber "patron". Therefore, all
17 content available on PATREON is considered commercial speech that is only available for
18 payment, which can be considered an entertainment service.

19
20 30. For a more technical discussion of the particular operations of this "pay-wall"
21 process the Court may refer to litigation in this district known as Case No.: 5:18-cv-05599-BLF,
22 PERSONALWEB TECHNOLOGIES, LLC. V. PATREON, INC. Suffice to say that when two
23 computers are communicating over the Internet (subscriber/patron and server/content provider)
24 they usually are not directly connected to each other but rather interact via chains of network
25 appliances and other computers (e.g., "switches" and "intermediate" servers). PATREON acts as
26 a third-party intermediary to facilitate the commercial distribution of such video podcast content.
27

1 31. PATREON’s “Community Guidelines” state, in pertinent part, as follows:

2 Bullying, Harassment, Threats and Hate Speech “Patreon should feel like a safe place for
3 normal people. We don’t allow bullying or harassment on Patreon.... That said, there is no room
4 on Patreon for hate speech or serious threats of violence. For us, hate speech includes serious
5 attacks on people based on their race, ethnicity, national origin, religion, sex, gender, sexual
6 orientation, age, disability or serious medical condition.”

7
8 Facilitating Harmful or Dangerous Activity

9 “We don’t allow funds to be collected for organizations that promote, forums that
10 distribute, or anything else that primarily facilitates harmful or dangerous activities. For
11 example, an organization that promotes sexual abuse, intellectual property violations, weapons,
12 commercial spamming, self harm, drug manufacturing techniques, or property crimes would be
13 prohibited from receiving funds through Patreon.”

14
15 These Guidelines are Enforced

16
17 “Creators who violate these community guidelines may be banned from using Patreon.
18 Depending on the severity of the violation, a Creator may instead receive a strike on his or her
19 account. If you see a page on Patreon that you feel violates our community guidelines, please
20 send us an email. Please also realize that Patreon is a diverse community, and while you may not
21 necessarily agree with someone’s point of view, it may not be a violation of our community
22 guidelines.”

23
24 32. PATREON has been notified of Defendants’ harassments campaigns on several
25 occasions, however, they have yet to take down Defendant CrowdSource The Truth page, and
26 continue to receive a substantial amount of revenue from CrowdSource The Truth “subscribers” /
27 “patrons”.
28

1 33. PATREON's lack of response, when notified on at least seven (7) occasions, that
2 specific users were inciting followers to harass, stalk, and threaten the Plaintiff is
3 unconscionable, and tantamount to being a willful participant in the threats, and encouraging the
4 harassment to continue, for their own financial gain.
5

6 34. PATREON did nothing to stop the Defendants' conduct, and instead, tacitly
7 encouraged its continuation, for its own financial gain. Therefore, the threats and harassment
8 against Plaintiffs' continues unabated on their pages, while PATREON generates substantial
9 revenues from the Defendants' campaigns against Plaintiff.
10

11 ***PLAINTIFF***

12 35. The Plaintiff is a *pro se* non-attorney layman that has suffered Article III (U.S.
13 Constitution) injuries and damages and seeks redress in the federal courts. The background
14 statement concerning the Plaintiff is hereby incorporated as if fully restated herein. Plaintiff has
15 suffered the dilution of his career in the emergency medical services and the emergency
16 management field as a direct result of the activities of the defendant corporations – MSDI /
17 21C3D.
18

19 36. Plaintiff is informed and believes and based thereon alleges that MSDI and/or
20 21C3D (Defendants), and all times relevant hereto was, a corporation organized under the laws
21 of the State of New York, with principal place of business located at 252 7th Ave, #6s, New
22 York, NY 10001.
23

24 37. Plaintiff is informed and believes and based thereon alleges that each of the
25 Defendants (MSDI / 21C3D) are in some manner responsible or legally liable for the actions,
26 events and circumstances described herein.
27
28

1 38. Plaintiff is informed and believes and based thereon alleges that each of the
2 Defendants (MSDI / 21C3D), and each of them, were and are agents, licensees, employees,
3 partners, joint-ventures, co-conspirators, joint tortfeasors, and/or principals and each of them are,
4 and at all times herein mentioned were, acting with the course and scope of agency, license,
5 partnership, employment, conspiracy, ownership, or joint venture.
6

7 **DEFENDANT'S WRONGFUL CONDUCT**

8 39. Defendant companies and organizations, under the direction of the CEO, have a
9 four-year history of creating professional smear campaigns, reputation destruction campaigns
10 and political opposition attacks on social media. These Defendant entities have produced well
11 over fifty (50) podcast video productions that have singled out the Plaintiff and have insinuated
12 his involvement in criminal activities to an audience of tens of thousands.
13

14 40. Defendant companies, under the direction of the CEO, have a reputation for the
15 public broadcast of sensitive and personal facts about its individual targets to include the
16 Plaintiff. For example, the CEO, using these Defendant entities under the CrowdSource The
17 Truth trademark, has publicly revealed the name of the Plaintiff's handicapped son, along with
18 affirmative statements that Plaintiff is a "dead beat dad" and "wife swapper".
19

20 41. Defendants MSDI / 21C3D market their CrowdSource The Truth video podcast
21 content to the general public via several social media platforms, to include YouTube.com, Bit-
22 Chute, Twitter, Periscope, etc. The Defendants MSDI / 21C3D have used the Plaintiff's persona
23 in about fifty (50) video podcasts that associate the Plaintiff's ethical hacking skills with
24 fictionalized news accounts produced for the entertainment of the CrowdSource The Truth
25 audience. In this manner the Plaintiff's persona is used in "click-bait" video wrappers
26
27
28

1 (thumbnails, titles and podcast descriptions) to attract the general public to click on the content
2 which can provide monetized micro-payments to the Defendants MSDI / 21C3D.

3 42. These public videos are “adevetisements in disguise” commercial speech which
4 lure viewers to the public content, the first stage in a complex monetization scheme. During the
5 stage one videos, the CEO proclaims that viewers should continue to watch the second part of
6 the fictionalized entertainment on the CrowdSource The Truth PATREON gfan page – which
7 requires a paid membership (five dollars [\$5.00 US] per month). This is stage two.
8

9 43. Stage two videos are not available to the public and can only be viewed as part of
10 a paid performance. Again, indices of the Plaintiff’s persona (photo, name, persona) are linked
11 to these fictionalized news stories. These stories lay the blame for several tragic mass casualty
12 events at the feet of the Plaintiff. The CEO, using MSDI / 21C3D, has accused the Plaintiff of
13 operating as a “crisis actor” to participate in mass casualty events resulting in the deaths of
14 hundreds of people.
15

16 44. CrowdSource The Truth video content was widely disseminated beginning in
17 January of 2019 that implicated the Plaintiff in attempting hacking into the Vancouver Police
18 Department, British Columbia, in 2001 to destroy evidence related to the serial killings of
19 prostitutes at “Pig Farm” in Canada. See Robert Pinketon.
20

21 45. Several video podcasts (presumably displayed on both public social media and
22 PATREON) linked to the Plaintiff to the de-activation of encryption modules on public safety
23 radios used by fire fighters at the World Trade Center on September, 11, 2001. The Plaintiff was
24 linked to the deaths of 343 fire fights due to radio malfunctions.
25

26 46. Several video podcasts (presumably displayed on both public social media and
27 PATREON) linked the Plaintiff to the “Weatherman Underground” and a command center
28

operated at the University of Illinois “EVL” research center that was used to break security at the AEGIS combat ship training center near Trenton, New Jersey.

47. Dozens of other videos targeted the Plaintiff’s professional credentials as an “ethical hacker” for the purpose of sensationalized fictionalized content to increase individual web browser “clicks” (“click-bait”) and to gain more subscribers / “patrons” on the PATREON pay-wall service (stage one, stage two).

48. Defendants – all of them -- have intimidated, harassed, and threatened Plaintiff and his family members by disseminating to then of thousands of people the name of the Plaintiff’s handicap son, which include slanderous remarks such as “dead beat dad”, “wife swapper”, “schizophrenic” and a participant in criminal conspiracies and gangs. These claims of defamation are presently in adjudication in the S.D.N.Y. and not in this Court. They defamatory remarks are merely provided for instructional purposes.

FIRST CAUSE OF ACTION

(Misappropriation of Right of Publicity

California Civil Code § 3344.1 – Against All Defendants)

49. Plaintiff repeats, re-alleges, adopts and incorporates each and every allegation contained in Paragraphs 1 – 48, inclusive, as if fully restated herein.

50. The conduct of Defendants, as alleged hereinabove, under the CrowdSource The Truth trademark, constitutes a violation of Section 3344.1 of the California Civil Code, due to the knowing and unauthorized use of the Plaintiff’s name, likeness, photograph and name for commercial purposes, which have substantial commercial value.

51. Beginning in January 2018, the Defendant companies, via the direction of the CEO, under the CrowdSource The Truth trademark, sanctioned a series of podcast with a

1 Canadian hoax peddler named David Charles Hawkins. Fifty (50) video podcasts were
2 disseminated widely to tens of thousands of viewers which included the likeness, photograph,
3 and the name of the Plaintiff. These productions were commercial broadcasts of fictionalized
4 “news accounts” for which the Defendant companies received pecuniary remuneration from
5 Google, LLC / YouTube, LLC in the form of monetized video content.
6

7 52. As set forth more fully above, Defendants’ entire business is based around their
8 harassment campaigns against the Plaintiff and other like situated individuals, and creating
9 content around the use of Plaintiff’s name, photograph, picture, portrait and/or likeness, to solicit
10 patronage by their fans. Defendants’ most lucrative use of Plaintiffs’ name, photograph, picture,
11 portrait and/or likeness, appears to be through Defendants’ podcast, on PATREON, wherein
12 Defendants’ solicit fees from their “patrons” or fans, to access their podcasts, which are
13 principally based on using Plaintiffs’ name, photographs, pictures, portraits and/or likenesses, as
14 punching bags, and the basis of their shows, and the content therein. This is commercial speech
15 which does not qualify for the newsworthy privilege of Section 3344.1.
16
17

18 53. Defendants’ used Plaintiff’s name, photograph, picture, portrait and/or likeness in
19 numerous ways, to advertise, solicit, and promote their business to tens of thousands of listeners,
20 fans, and consumers; and on a variety of formats, and popular digital platforms, including, but
21 not limited to: PATREON, Facebook, YouTube, Twitter, Periscope, Bit-Chute, SubscribeStar,
22 and countless others.
23

24 54. In sum, this is considered “click-bait” or the use of a persona’s persona to attract
25 viewers to “click” on the podcast advertisement thumbnail (displayed in Google, LLC and
26 YouTube, LLC search results). The Plaintiff had no relationship to these advertisements in
27 disguise that proclaim viewers should become “patrons” via the PATREON.com and/or
28

1 SubscribeStar.com “pay-walls”, or metered video content that requires pre-payment via credit
2 card by subscribers.

3 55. The Defendant companies, operating at the direction of the CEO, under the
4 CrowdSource The Truth trademark, have made purely commercial video content with the
5 Plaintiff’s likeness available on the PATREON and SubscribeStar podcast subscription credit
6 card “pay for view” website. Such commercial content that attempts to establish a non-existent
7 relationship with The Plaintiff does not qualify for the newsworthy privilege exemption, as
8 codified in California Civil Code § 3344.1.
9

10 56. All of these tortious video productions are displayed for view to the general
11 public using an Internet browser to access video podcast content via Internet networked servers
12 that are maintained on-line by entities that operate public social media platforms in the
13 jurisdiction of this Court (e.g. Google, LLC, YouTube, LLC, PATREON, INC, etc.).
14

15 57. Mr. Goodman is not being sued as CEO of these enterprises as he is a well
16 experienced as *pro se* litigant of two (2) lawsuits filed against him in the Eastern District of
17 Virginia (Steele v. Goodman). This CEO has been rebuked several times by the presiding judge
18 in one of the E.D.VA lawsuits (filed in 2017). Mr. Goodman, as CEO, has co-hosted podcast
19 videos with a large host of attorneys in something called the “COUNTER LAWFARE
20 REPORT”; to include Jared Beck, Alan Dershowitz, and Larry Klayman, etc. This CEO has
21 attempted to manipulate the courts with resourceful but meritless claims.
22
23

24 **SECOND CAUSE OF ACTION**

25 **(Public Disclosure of Private Facts -- Against All Defendants)**

26 58. Plaintiff repeats, re-alleges, adopts and incorporates each and every allegation
27 contained in Paragraphs 1 – 57, inclusive, as if fully restated herein.
28

1 59. Defendants used Plaintiff's name, photograph, picture, portrait and/or likeness,
2 without his written consent, within the state of California, for purposes of advertising or trade.
3 Defendants use of Plaintiff's name, photograph, picture, portrait and/or likeness, was a use in, or
4 as part of, an advertisement or solicitation for patronage.
5

6 60. Defendants' published and republished Plaintiff's name, photograph and/or
7 likeness in multiple formats, including their own promotions and advertisements, websites, social
8 media platforms. Defendants' use of Plaintiff's name, photograph, image and/or likeness – on
9 countless occasions and in numerous formats - is clearly a recognizable likeness of the Plaintiff
10 and is readily identifiable by someone familiar with him.
11

12 61. Under California law, the public disclosure of private facts is defined as (1) a public
13 disclosure of (2) private facts about an individual (3) that would offend the average person, that (4)
14 was not of legitimate public concern; and (5) where defendant published private facts with reckless
15 disregard for their truth or falsity.
16

17 62. This tort can be described as, "One who gives publicity to a matter concerning the
18 private life of another is subject to liability to the other for invasion of his privacy, if the matter
19 publicized is of a kind that (a) would be highly offensive to a reasonable person, and (b) is not of
20 legitimate concern to the public." (Rest.2d Torts, § 652D.)
21

22 63. Plaintiff claims that Defendants – all of them – violated Plaintiff's right to privacy by
23 their tortious conduct by the publicized of private information concerning the Plaintiff, that a
24 reasonable person in Plaintiff's position would consider the publicity highly offensive, that
25 Defendants – all of them -- knew, or acted with reckless disregard of the fact, that a reasonable
26 person in Plaintiff's position would consider the publicity highly offensive, that the private
27 information was not of legitimate public concern (or did not have a substantial connection to a matter
28

1 of legitimate public concern), that the Plaintiff was harmed, and that the Defendant's conduct was a
 2 substantial factor in causing Plaintiff's harm.

3 64. The Defendants – all of them – as directed by the CEO acting in the scope of his
 4 authority, released private information about the Plaintiff that was made public by either
 5 communicating said information via social media accounts controlled by the Defendants, to include
 6 Twitter, YouTube, PATREON, SubscribeStar, Vimeo, Banned.Video, Facebook (now banned),
 7 BitChute, Periscope, etc. These social media services were used to obtain commercial value by the
 8 morbid and sensational prying into private life of the Plaintiff for the sake of financial reward.
 9

10 **THIRD CAUSDE OF ACTION**

11 **(Common-law right to publicity)**

12 65. Plaintiff repeats, re-alleges, adopts and incorporates each and every allegation
 13 contained in Paragraphs 1 – 64, inclusive, as if fully restated herein.
 14

15 66. The Defendant entities used the Plaintiff's identity, likeness, name and persona
 16 for commercial purposes without the Plaintiff's authorized permission which has resulted in
 17 injury to the Plaintiff's career, reputation and long-term employment prospects.
 18

19 67. This tort can be described as, "One who appropriates to his own use or benefit the
 20 name or likeness of another is subject to liability to the other for invasion of his privacy",
 21

22 Restatement (Second) of Torts Sec. 652 C (1977)

23 **FOURTH CAUSE OF ACTION**

24 **(Intentional Infliction of Emotional Distress)**

25 68. Plaintiff repeats, re-alleges, adopts and incorporates each and every allegation
 26 contained in Paragraphs 1 – 67, inclusive, as if fully restated herein.
 27

69. Plaintiff claims that Defendants' conduct caused to suffer severe emotional distress due to the outrageous conduct of the Defendant's – all of them – and that Defendants' acted in reckless disregard to the probability that Plaintiff would suffer emotional distress, and that the Defendants – all of them – intended to cause emotional; distress with their outrageous conduct which was a substantial factor in causing Plaintiff's severe emotional distress.

FIFTH CAUSE OF ACTION

(Intentional Misrepresentation)

70. Plaintiff repeats, re-alleges, adopts and incorporates each and every allegation contained in Paragraphs 1 – 69, inclusive, as if fully restated herein.

71. Plaintiff claims that Defendant PATREON made false representations that harmed him, by the Defendant's (PATREON) willful conduct to represent the integrity of the "Trust and Safety Team program" and that misrepresentations and falsehoods about the "Trust and Safety Team program" were true, that the Defendant knew this representation was false, that Defendants allowed these statements to be widely published recklessly and without regard for its truth; and that Defendant intended that Plaintiff, and others like him, rely on the misrepresentation and that Plaintiff reasonably relied on the false representations about the "Trust and Safety Team program" which caused harm to the Plaintiff.

DAMAGES

Defendants' acts and conduct have caused damage to Plaintiff and Plaintiff is entitled to recover from Defendant the damages sustained by Plaintiff as a result of Defendant's wrongful acts in an amount subject to proof at trial.

PRAYER FOR RELIEF

1 WHEREFORE, Plaintiff D. GEORGE SWEIGERT requests entry of judgment in
2 its favor and against Defendant as follows:

3
4 **DEMAND FOR JURY TRIAL**

5
6 Pursuant to Fed. R. Civ. P. 38(b) and Local Rule 3–6, Plaintiff D. GEORGE SWEIGERT hereby
7 demands a trial by jury on all issues triable in this action.

8 Respectfully submitted, Dated:

9
10
11 D. GEORGE SWEIGERT
12 c/o GENERAL DELIVERY
13 MOUNT SHASTA, CA 96067
14 Spoliation-notice@Mailbox.org
15
16
17
18
19
20
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(EXHIBIT B)

All Posts



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#SDNYORG • Oct 19, 2020 • 4 min read



QAnon "founder" DEFANGO linked to Steven Scott Biss, esq. in Virginia court documents

Updated: Oct 23, 2020



ADVISORY:

The teleconference will be held as scheduled on **October 30, 2020 at 12:00 p.m.** The parties must appear for the conference by dialing 888-363-4749, using the access code 3121171, and the security

The teleconference will be held as scheduled on October 30, 2020 at 12:00 p.m. The parties must appear for the conference by dialing 888-363-4749, using the access code 3121171, and the security code 7269. Plaintiffs' counsel may participate in the conference even if the *pro hac vice* motions have not been granted.

SO ORDERED.



HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE

10/22/2020

Above: Hearing set for Jason Goodman

OPINION AND EDITORIAL

MASTER MIND OF QANON IDENTIFIED (?)

Dramatic events continue to unfold as the Financial Times of the City of London has outed Carson City, Nevada resident Manuel Chavez, III as "DEFANGO", alleged founder of the alt-right wing militant movement "QAnon".

Chavez (aka DEFANGO) makes no secret that he has openly communicated with Robert David Steele in the context of lawsuits against Jason Goodman (New York City). Even more disturbing is the link between DEFANGO and founder of Crowdsourc The Truth, Goodman.

Many Internet observers will recall when "DEFANGO" filmed himself outside of Jason Goodman's New York City penthouse in the Chelsea section of Manhattan. That event apparently preceded significant exchanges in e-mail messages and telephone calls between the pair.

According to court documents filed in the federal court serving Alexandria, Virginia today, "DEFANGO" apparently worked with several suspected "QAnon" promoters.



(EXHIBIT C)

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FOI/PA
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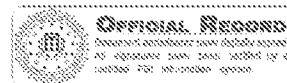
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b7E**FEDERAL BUREAU OF INVESTIGATION****Import Form**b6
b7C**Form Type:** FD-71A**Date:** 09/21/2017**Title:** U Potential WMD Threat aboard the Maersk Memphis in Charleston, SC**Approved By:** [REDACTED]b6
b7C**Drafted By:** [REDACTED]**Case ID #:** [REDACTED](U) ASSESSMENT ZERO FILE FILES
MAINTAINED IN RECORDS SECTIONb3
b7E

Synopsis: U On 06/14/2017 the USCG was alerted to the presence of a youtube broadcast, wherein the participants discussed unattributed information that potentially, there was an RDD(radiological dispersal device), or "dirty-bomb" aboard the Maersk Memphis, which was, at the time of the broadcast, mooring at the Wando-Welch Terminal of the Charleston (SC) Harbor.

b7E

After a telephonic encounter with the YouTube video's contributing source of information, George Webb Sweigert, in order to obtain more specific information regarding his source of threat information and greater specificity of the threat, a joint agency team selected four containers from the Maersk Memphis for thorough screening. The selection of containers was based on information in the video and the information provided by Sweigert by phone.

All four containers, which were [REDACTED] were offloaded, screened for radiological and other hazards, and declared as a non-hazard. A fifth container meeting the same selection criteria as the four in Charleston, which was previously offloaded in NJ, was located and screened by CBP in Port of Elizabeth, NJ and declared non-hazardous.

b7E

~~SECRET//ORCON/NOFORN//LES~~

~~SECRET//ORCON/NOFORN//LES~~

Title: U Potential WMD Threat aboard the Maersk Memphis in Charleston, SC

Re: [REDACTED] 09/21/2017

Zanesville (OH) Police Department, with information provided by CO Division [REDACTED] located Sweigert on the side of the road in a rental vehicle. He was subsequently arrested on a local jurisdiction charge. [REDACTED] was sent an urgent lead for the interview of Sweigert at the Zanesville City Jail, Zanesville, OH, which was accomplished on 06/15/2017.

b7E

Further documentation of events will be captured in follow-up entries to this Assessment.

Enclosure(s): Enclosed are the following items:

1. U//~~LES~~ Police Incident Report: George Webb Sweigert
2. U//~~FOUO~~ Clear Database Check Results
3. U//~~FOUO~~ NYPD Database Check Results
4. U//~~FOUO~~ [REDACTED] Database Check Results
5. U//~~FOUO~~ FD-302 Interview of George Webb Sweigert
6. U//~~FOUO~~ FBI SIOC final email update received on 06/15/2017

b7E

~~Reason: 1.4(b)
Derived From: National
Security Information SCG
Declassify On: 50X1-HUM~~

◆◆

~~SECRET//ORCON/NOFORN//LES~~

OH0600199.256514.DR.ORDMVR00.OH0600199.
TXT

OREGON MOTOR VEHICLES

NAM/SWEIGERT, GEORGE W

DOB/1960-10-12

PORTLAND, OR 97217

SEX/MALE
HAI/

HGT/608
EYE/

WGT/260
RAC/UNKNOWN

b6
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OLN/4266927 OLS/OR

STATUS: VALID OPERATORS LICENSE

ISSUED: 2014-11-04 CLASS: LICENSE EXPIRES: 2022-10-12

THIS INFORMATION IS PROVIDED FOR LAW ENFORCEMENT PURPOSES ONLY

UNLESS OTHERWISE NOTED, THIS LEADS THROUGHPUT IS EXEMPT FROM PUBLIC RECORDS
REQUESTS PER ORC:149.43 AND OAC:4501:2-10-06.

MRI: 7685369

IN: #2263 AT 15JUN2017 02:31:32

OUT: OH0600199 #185 AT 15JUN2017 02:31:32

~~11/17~~ 11/17-015065 BAIN
4 11/17-015067 PLAYFORD

[REDACTED]

ADDRESS

[REDACTED]

PORT WADYVE IN

b6
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[REDACTED]

OH0600199.256513.KR.ORDMVR00.OH0600199.
TXT

OREGON MOTOR VEHICLES

b6
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SWEIGERT, GEORGE W

PORTLAND OR 97217

LIC:NO:4266927 TYPE:C END:

EXP:10-12-2022 ISS:11-04-2014 DOB:10-12-1960 1ST LIC:00-00-0000

SEX:M HEIGHT:6-08 WEIGHT:260 CDL:NO VETERAN:NO

STOPS:00 RES:D

****STATUS ON 06-14-2017****

CDL:NONE

DL:VALID OPERATORS LICENSE

ISS 10-14-98 INT EXP: 00-00-00 MAILED: 00-00-00

ISS 10-04-99 INT EXP: 00-00-00 MAILED: 00-00-00

ISS 05-05-03 INT EXP: 00-00-00 MAILED: 00-00-00

ISS 10-22-04 INT EXP: 00-00-00 MAILED: 00-00-00

ISS 07-25-06 INT EXP: 00-00-00 MAILED: 00-00-00

ISS 01-18-12 INT EXP: 02-17-12 MAILED: 01-24-12

DUPL 01-18-12

ISS 11-04-14 INT EXP: 12-04-14 MAILED: 11-07-14

DUPL 07-08-15 STICKER

DUPL 12-24-15 STICKER

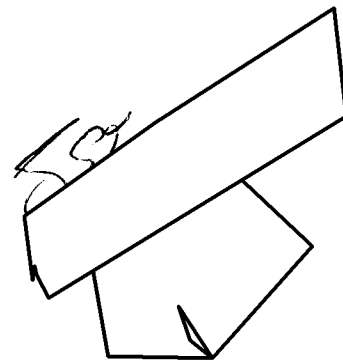
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REQUESTS PER ORC:149.43 AND OAC:4501:2-10-06.

MRI: 7685317

IN: #2261 AT 15JUN2017 02:31:29

OUT: OH0600199 #184 AT 15JUN2017 02:31:31



ZANESVILLE POLICE DEPARTMENT
332 SOUTH STREET
ZANESVILLE, OHIO 43701-3480
(740) 455-0700

SUPPLEMENTARY REPORT

DATE:

INC. #:

06-15-2017

17-015065

Linked with 17-015067

On 06-15-2017 at approximately 0145 hours, I spoke to FBI agent [REDACTED] Agent [REDACTED] had contacted the Zanesville Police Department to speak with a supervisor reference of matter. I was returning his phone call.

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Upon speaking to Agent [REDACTED] he advised me that he was a field agent from Charleston, South Carolina area and they were actively investigating a claim that a possible weapon of mass destruction or a dirty bomb had come into the Charleston Port in a shipping container. Agent [REDACTED] stated that the tip for the device was given via YouTube and that they had had contact with the subject, identified as George Webb. Agent [REDACTED] advised me that he believed George Webb's full name included the last name Sweigert. He advised that they had conducted pings on his cell phone during their communications and the most recent one showed that the phone was within 30 meters of the location for The Barn at 1947 Linden Avenue in Zanesville. Agent [REDACTED] advised me that, while speaking with George Webb, he heard the door chime of a vehicle and Webb had also advised the agent that he needed to go because the music was about to begin. I advised him that this information sounded consistent with most likely the parking lot near the patio of The Barn.

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Myself and Patrolman [REDACTED] responded to attempt to locate the subject. Agent [REDACTED] had asked officers to attempt to locate George Webb, providing a description of him as being between 40-50 years of age with dark hair and a possible gray patch in the center. He stated he was unsure of his height based on the YouTube broadcast but was forwarding information to the department's e-mail. I advised dispatchers that there would be information regarding the subject coming through the department's e-mail account and that I was going to respond to The Barn to attempt to locate the subject for the FBI's investigation.

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Upon my arrival, along with Patrolman [REDACTED] there were numerous people on the patio and also inside the bar. A large number of people were leaving the bar. We began checking the parking lot and I went into the bar attempting to locate anyone that I saw on an electronic device or possibly matching the description. I spoke to the bartender

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and the server on the patio. No one had observed anyone suspicious or using electronic devices at the bar through the evening that matched the description I had been provided.

I made contact with Agent [REDACTED] advising him that we were unsuccessful in locating the subject in the area.

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As I concluded my conversation with him and was returning to my patrol car, I overheard radio traffic for the return of a driver's license returning to George Webb Sweigert. At that time, I discovered that Patrolman [REDACTED] and Patrolman [REDACTED] were investigating a suspicious vehicle/suspicious person call at [REDACTED] Avenue. I advised units that we needed to speak to the Sweigert subject. Patrolman [REDACTED] advised me that they did have the subject along with his rental vehicle and they were actually located on Henry Street just east of Goddard. Patrolman [REDACTED] and myself responded.

Upon our arrival, I made contact with George Webb Sweigert. He was with his vehicle, which was a 2017 Dodge Ram, blue in color, rental vehicle. The call that was being investigated was involving two to three subjects getting out of the vehicle where Mr. Sweigert's vehicle was at and heading into the wooded area with flashlights. Upon officers' arrival to the area, they only located Sweigert in his vehicle in the driver's seat.

Upon officers' interaction with Sweigert, it was determined that he was intoxicated and in physical control of the vehicle. I had requested him to perform some field sobriety tests for Patrolman [REDACTED] based on the investigation of him being impaired and in physical control, and he refused all tests and was taken into custody.

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I made contact with Agent [REDACTED] advising him of the arrest of Sweigert and that he had been located on an unrelated call by other officers and I had become aware of them locating him. Patrolman [REDACTED] transported Sweigert to the Zanesville City Jail where he was booked in and processed for having physical control of a vehicle.

Myself, Patrolman [REDACTED] and Patrolman [REDACTED] performed an inventory and search of Sweigert's vehicle based on the arrest. There was miscellaneous clothing and luggage that appeared that Sweigert had been traveling around the area. I had located miscellaneous gas receipts and various pieces of scrap paper containing various names and locations. All the items were inventoried. Sweigert's cellular phone, charging cable, and his laptop (which was in a satchel-type backpack) were taken out of the vehicle to be submitted into his personal property during booking. Officers did check the backpack that contained the laptop. There was also miscellaneous clothing and a journal book that appeared Sweigert had been writing in which contained a variety of different names and locations. Aside from Sweigert's cellular phone and laptop bag, all other personal items were secured in the vehicle after the inventory and the vehicle was taken to A-1 Towing's impound yard.

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Patrolman [] advised me that Sweigert had refused all field sobriety and breath tests upon intake to the jail. He was cited into Municipal Court for Thursday, 06-15-2017.

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My last communication with Field Agent [] was that a FBI agent from the Columbus office would be coming to the Zanesville City Jail at approximately 0900 hours to interview Sweigert in reference to the tip involving the Port Charleston investigation.

When I had originally encountered Sweigert during the suspicious person call, I knew officers had already spoken to him regarding him being in the area. I again asked him as to why he was parked where he was. He had originally advised officers that he was unable to get a hotel, having checked three of them in the area, and he was going to simply sleep on the side of the road. Continuing to speak with Sweigert, he began to open up, stating that he was a reporter for the US News Corp and that he provided information and tips in addition to the news that people were too scared to share. I again asked him as to why he was not only parked where he was but in the Zanesville area in general. He advised that he had just met with one of the people that he gets information from and they live in Zanesville. He stated that he was in the location he was at because he had just dropped the subject off, identifying him as a former police officer who now works for the state and made a reference to the mental health board or something to that effect.

Sweigert also made the statement to officers that he had just left West Virginia, having met with six individuals down there that provided him with information and did acknowledge that he had provided a tip earlier in the evening to stop a terror attack. I did advise Sweigert that I was aware of the investigation involving his tip and that there was most likely going to be someone wanting to speak with him in the morning regarding that investigation.

During my speaking with Sweigert, he had asked about his rights involving the investigation on the physical control. I told him I could advise him of his Miranda rights and warnings. He advised that he was fully aware of those and I had simply advised him that he had the right to either perform or refuse to perform the field sobriety tests for the investigating officer. The information that Sweigert provided as far as his communication with people he felt he was protecting was given voluntarily on his own.

END OF REPORT

Sergeant []



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ZANESVILLE POLICE DEPARTMENT
332 SOUTH STREET
ZANESVILLE, OHIO 43701-3480
(740) 455-0700

SUPPLEMENTARY REPORT

DATE:

INC. #:

6/15/2017

17-015065 & 17-015067

At approximately 0207 hours on the morning of 6/15/2017 I was dispatched to [REDACTED] Avenue in reference to a suspicious person where two to three males were seen getting out of a car parked on Henry Street and walked to Playford Avenue with flashlights and walked to [REDACTED] Avenue.

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Upon arrival I observed lights on in [REDACTED] Avenue and two individuals asleep in a bedroom inside the residence but I saw nobody outside of the residence with flashlights.

I knocked on the front door of [REDACTED] Avenue when a female came to the door, [REDACTED] who dispatch had on file as the public service and contact information. Ms. [REDACTED] stated she had not seen anybody outside of the residence and that she and her husband have lived at the residence for several years but there's always strange things going on at [REDACTED] Avenue.

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After speaking to Ms. [REDACTED] Ptl. [REDACTED] and I went to [REDACTED] Avenue where I spoke to [REDACTED] the original caller. When speaking to [REDACTED] [REDACTED], she stated she saw two or three subjects get out of a vehicle on Henry Street and walk up through the yards back toward the rear of [REDACTED] Avenue but then saw the subjects walk back behind her residence and up between some houses but saw one less return from the rear of [REDACTED] Avenue than had gone in from the rear of. [REDACTED] pointed to the vehicle that she observed the male subjects get out of on Henry Street.

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Ptl. [REDACTED] and I went down to the vehicle to investigate. Ptl. [REDACTED] ran the license plate number and then drove on down Henry Street to see if he could observe anybody out in that area and at that point in time I pulled up behind the vehicle, registration PIE7394 on a 2017 Dodge Ram 1500, blue in color and when walking up to the vehicle, I observed a male subject passed out in the driver's seat of the vehicle.

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While radioing to Ptl. [REDACTED] to advise him that there was somebody in the vehicle, the male subject in the driver's seat woke up and looked at me. At that point in time I knocked on the window for him to put the window down or open up the door. He opened up the door and I immediately smelled the odor of an alcoholic beverage on his person. The truck was not running but the male subject inside stated "here let me

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turn the vehicle off". He pulled the keys from the ignition and sat them on the dash to prevent the bell of the door from dinging.

I asked the male subject if he had some form of ID on him. He stated he did and he provided me with. I identified the male subject in the driver's seat as George W. Sweigert with a driver's license from Portland, Oregon and when I asked Mr. Sweigert what he was doing asleep in his vehicle on a dead end street, he stated he was in town talking to a lead from an individual who he was doing a story on. I asked Mr. Sweigert what he meant by that and he stated that he was a reporter for US News and that he had a You Tube channel. I asked Mr. Sweigert what kind of news he reported and he stated he spoke to individuals to get information about incidents that they were too scared to talk about to people. Mr. Sweigert was having a hard time remembering where he had been so I asked Mr. Sweigert if he knew where he and he stated he had been all over but he had recently been in West Virginia meeting with a group of people about a possible terrorist attack and that now he was in Zanesville and had been on Linden Avenue and he thought he was parked in a parking spot where he could sleep until morning and then continue on to meet another informant somewhere else tomorrow.

When running Mr. Sweigert's information through dispatch, Sgt. [REDACTED] heard the radio traffic and when hearing the name advised me to hold the subject if I had him that he had been looking for him at The Barn on Linden Avenue.

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I advised Sgt. [REDACTED] that I had Mr. Sweigert on Henry Street and Sgt. [REDACTED] and Ptl. [REDACTED] arrived at Ptl. [REDACTED] and my location. When Sgt. [REDACTED] arrived on scene, he advised me he needed to use my cell phone which he used to call dispatch and advised me he had been in contact with the FBI in reference to George Sweigert. Sgt. [REDACTED] then made contact with somebody that he had spoken to who was searching for George Sweigert who the FBI wanted to speak with and after speaking to the agent Sgt. [REDACTED] had been working with to locate Mr. Sweigert.

Sgt. [REDACTED] asked George Sweigert if he wished to take field sobriety tests for his physical control or if he wanted to refuse. George Sweigert refused taking the field sobriety tests and he was advised he was going to be placed under arrest for the suspicion of having physical control of a vehicle while intoxicated. At which point in time I placed George Sweigert into handcuffs and under arrest and placed him in the back seat of my cruiser.

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Mr. Sweigert was advised that the FBI wanted to speak with him and that after court in the morning there would be an agent at the police department to speak with him. Sgt. [REDACTED] advised Mr. Sweigert that his laptop and cell phone would be taken to the jail with him to be placed in his property and that the vehicle would be towed and inventoried and he would be able to get out later.

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Sgt. [REDACTED] grabbed Mr. Sweigert's back pack with his laptop in it as well as his cell phone that I took into my cruiser and I transported George Sweigert to the Zanesville City Jail.

When getting to the Zanesville City Jail, I read George Sweigert the implied consent form on the back of the BMV 2255. Mr. Sweigert refused to take a Breathalyzer.

I completed the refused test on the Intoxilyzer 8000 and cited Mr. Sweigert into the Zanesville Municipal Court for Thursday 6/15/2017 at 9:00 a.m. for physical control.

I cleared the jail at 0428 hours.

END OF REPORT

Ptl



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CITY OF ZANESVILLE POLICE DEPARTMENT
VEHICLE INVENTORY

REPORT NO. 17-015067		DATE / TIME 6 / 15 / 17		LOCATION Henry St		REASONS FOR CUSTODY	
VYR 2017	VMA Dodge	VMO Ram 50	VST OL	VCO Blue	ODOMETER 9238	<input checked="" type="checkbox"/> Driver Arrested <input type="checkbox"/> # _____ OVI <input type="checkbox"/> DUS <input type="checkbox"/> Wrongful Entrustment <input type="checkbox"/> Forfeiture <input type="checkbox"/> Abandoned - Hazardous <input type="checkbox"/> 72 Hour Violation <input type="checkbox"/> Evidence b6 <input type="checkbox"/> Felony b7C <input type="checkbox"/> Crash <input type="checkbox"/> Impound <input type="checkbox"/> Owner Unverified <input type="checkbox"/> Other _____	
VIN 1C6RR76G0HS731429			LIC PIE 7394		STATE Ohio		
DRIVER LAST NAME Sweigert			DRIVER FIRST NAME / MI George W				
ADDRESS [Redacted] Portland OR. 97217					HOME / CELL NO.		
OWNER (IF SAME AS DRIVER, WRITE "SAME") EAN Holdings LLC.							
ADDRESS (IF SAME AS DRIVER, WRITE "SAME") 554 WATER ST Charbon Oh 44024							
LOCATION P1 - Front Pass. P2 - Rear Pass. G - Glove Box T - Trunk / Cargo E - Engine C - Center Console		<input type="checkbox"/> GPS Device <input type="checkbox"/> Radar Detector <input type="checkbox"/> CB <input checked="" type="checkbox"/> Stereo / # CD's / DVD's		<input type="checkbox"/> CD / DVD <input type="checkbox"/> Laser Detector <input type="checkbox"/> Cell Phone		CIRCLE DAMAGE [X] Total Keys [X] Key-Ignition [X] Key-Trunk	
						Condition <u>Good</u> Seats Wheels Glass Undercarriage <input type="checkbox"/> Photos <input type="checkbox"/> Drivable	
LOC	INVENTORY / REMARKS			LOC	INVENTORY / REMARKS		
P2	Black Suit Case mis clothes			P2	mis Trash		
P2	Brow PAPER Bag			P2	mis PAPERS		
P2	mis clothes			G	mis PAPERS		
P2	mis BOOKS (6)			P1	2 PAIR SUNGLASSES		
C	Blue FLASH DR.						
C	3.00 US CURRENCY						
C	Blue Charger						
C	Black charge						
C	white wall charger						
P1	Pair Brown Dress shoes						
P1	1 Book						
ARRESTING / INVENTORY OFFICER PT2 [Redacted]		UNIT NO. [Redacted]		DATE / TIME 6 / 15 / 17		Wrecker Company <u>A-1</u> b6	
SUPERVISOR [Redacted]		UNIT NO. [Redacted]		DATE / TIME 6 / 15 / 17 / 0425		Vehicle Store <u>A-1</u> b6 Tow Driver Signature <u>[Redacted]</u> b7C Owner Request <input type="checkbox"/>	
____ (INITIALS) ENTERED INTO L.E.A.D.S TOWED VEHICLE FILE-DATE/OCA _____ ____ (INITIALS) CLEARED FROM L.E.A.D.S TOWED VEHICLE FILE-DATE _____ RELEASED BY _____ DATE RELEASED _____ TIME _____ REMARKS _____						CONDITIONS FOR RELEASE <input checked="" type="checkbox"/> No Hold <input type="checkbox"/> Hold <input type="checkbox"/> Court Release <input type="checkbox"/> Other _____	
RELEASE OF PROPERTY							
<input type="checkbox"/> Plates	SIGNATURE X		UNIT NO.		DATE / TIME / /		
<input type="checkbox"/> Vehicle	SIGNATURE X		UNIT NO.		DATE / TIME / /		

2017 4:37:55 AM

Printed By: RN619247 from: ZANPDD001

Received Time: 04:37:13 06-15-17 Source ORI: OHBMV0000
Summary: RP: LIC=PIE7394 REQ=RKB
View Message Details

RP.OH0600100.PIE7394 ,PC.REQ/RKB 06/15/2017 04:37:20
PIE7394 2018 TK (NORMAL ISSUE) EXPIRES/20180331 REG YR:1
EAN HOLDINGS LLC TAX/264086616
554 WATER ST CHARDON OH 44024 2803 RENTAL
1C6RR7GG0HS731429 2017 RAM TK PURCHASED 04/05/2017
TITLE/6701962965 ODOMETER/0000010 WGT/002000 TAX-WT/006800

ISSUED 20170410 BY AGENCY 7726 APPLICATION 471337FX OLD-LIC/PIE7394
PLATE COLOR/ OHIO PRIDE VEH COLOR/ UNKNOWN
END

UNLESS OTHERWISE NOTED, THIS LEADS THROUGHPUT IS EXEMPT FROM PUBLIC RECORDS
REQUESTS PER ORC:149.43 AND OAC:4501:2-10-06.

MRI: 7746962

IN: OHBMV0000 #16073 AT 15JUN2017 04:37:13
OUT: OH0600100 #34 AT 15JUN2017 04:37:13

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Date of entry 06/15/2017

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This document contains neither recommendations nor conclusions of the FBI. It is the property of the FBI and is loaned to your agency; it and its contents are not to be distributed outside your agency.

[REDACTED]

Continuation of FD-302 of (U) Interview of George Webb Sweigert , On 06/15/2017 , Page 2 of 7

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[REDACTED] his investigation found they own [REDACTED]
[REDACTED] Sweigert also referenced [REDACTED]
[REDACTED] He noted that a car company called Cars International in Falls Church, VA had been [REDACTED] but went bankrupt. Sweigert believes the [REDACTED] Pakistan via Florida out of a business in Lorton, VA. Additionally, he referenced a produce transportation business the [REDACTED] own. He believed that they used these businesses to launder money in order to support radical Islamic terror.

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Sweigert mentioned the Facebook pages of the [REDACTED] brothers. Sweigert said there are pictures of radical Islamic clerics on their Facebook sites. There were also pictures of men kissing AK-47s.

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Sweigert heard about the [REDACTED] brothers roughly 100 days ago. He heard about them on Foxnews. Sweigert believes it was reported on by television journalist [REDACTED] There were also other news articles and a report by [REDACTED] (sic) of the Daily Caller.

Sweigert after hearing of the [REDACTED] brothers he made multiple phone calls to the FBI Office in Portland, Oregon. Sweigert lived there at the time. Sweigert was trying to get a hold of Mr. McCabe. Sweigert also referenced FOIA requests on himself he had sent to the FBI with no response.

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Sweigert is not employed at this time. He was the number one computer software sales person for IBM in 2013. He has since had trouble finding a job. He has attempted to get a job all over the United States as well as in Canada. Sweigert currently lives with [REDACTED] in Fort Wayne, Indiana.

Sweigert believes he is a member of the Counter Intelligence Program of the FBI. Sweigert said there are two fields in the FBI. There are the field agents and the counter intelligence agents. Neither side really communicates with the other. He described a wall between the two fields. Sweigert believes he has met with agents of the counter intelligence field. He admitted he could have fallen for a trick. Sweigert did not know any names of the people he met. He said they would be called [REDACTED] And that [REDACTED] would tell him to meet him in a park where [REDACTED] would be wearing a hat.

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Sweigert was asked specifically about communication he had with any sources for an incident in South Carolina on June 14, 2017. Sweigert had received information from one of his sources. Sweigert did not know his real name. The source went by the name of [REDACTED] The source is a [REDACTED]
[REDACTED]

[REDACTED]

Continuation of FD-302 of (U) Interview of George Webb Sweigert , On 06/15/2017 , Page 3 of 7

[REDACTED] currently lives in Parkersburg, WV. Sweigert had a meeting with [REDACTED] for a couple of hours on June 14, 2017.

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[REDACTED]

Sweigert said he publishes all his source documents. Most of the information he gets are from sources. Sweigert mentioned that he received the Virginia business numbers and Bill of Ladings for the Maersk Memphis from his sources. One of [REDACTED] sources reported the Memphis was involved in moving contraband between the U.S.A and Pakistan. It was mentioned Bas manti (sic) Rice was transported because its sweet smell would throw off search dogs. He noted that the rice was only shipped once every 14 months, which was an "odd pattern".

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Sweigert has used, and believes his sources used, a website called import genius to obtain the ship bill of ladings. The Secretary of the State for Virginia website was also used to identify the business telephone numbers related to Maersk shipping. Additionally, people who watch his YouTube channel would contribute information.

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Sweigert never stated there was a dirty bomb on the Maersk Memphis. Sweigert's followers helped connect the dots. One of his followers found a website which can geo-locate any ship. The followers on YouTube found the ship in South Carolina and told Sweigert where it was.

Sweigert first heard about the Maersk contraband issue from his source 45 days ago. The source was [REDACTED] told Sweigert the Memphis was a potential vehicle for terrorist activity. Sweigert then met with the source for three and a half hours in Parkersburg, WV on June 14, 2017. [REDACTED] contacted Congressman Louie Gohmert, US Congressman from Texas. Gohmert was contacted because he was the only one to put the [REDACTED]

[REDACTED]

After meeting with [REDACTED] Sweigert live streamed from outside the FBI center in Clarksburg, WV. Sweigert believe the center is used for fingerprint analysis, biometrics, and is secretly used for satellite data for the CIA. Sweigert found most of the information on the FBI website and a lawsuit by [REDACTED] against the satellite usage at Clarksburg.

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[REDACTED]

Continuation of FD-302 of (U) Interview of George Webb Sweigert , On 06/15/2017 , Page 4 of 7

Sweigert mentioned he had attempted to have meetings with approximately 30 US Senators and Congressmen on Capitol Hill. He referenced Rand Paul. Sweigert said he had a meeting with Paul's legislative affairs person. He said all of his attempts were documented on his YouTube channel. Sweigert also mentioned a tweet he received from Former FBI Director Louis Freeh.

Sweigert stated that he had gone to all [REDACTED] brothers. He had attempted to speak with someone at each of the residences. Sweigert made contact with a US Marine named [REDACTED] at [REDACTED], Lorton, VA. The Marine said he rented the house from an [REDACTED]. Sweigert believed the name given to [REDACTED] was fake. [REDACTED] then mentioned he was made renting the house through [REDACTED] wife [REDACTED]. Sweigert noted that [REDACTED] found a pile of blackberry cell phones and laptops with congressional markings on them. Sweigert believed that they were stolen from congressional offices and that [REDACTED] called the FBI about them. NCIS and the Capitol Police also were involved in responding to the incident.

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Sweigert was asked about his sources and how he views them. Sweigert said there are different levels of his sources. The highest are official documents or the hand written reports he finds. The next level are journalists. He mentioned individuals such as [REDACTED] (sic) for the Washington Post. And finally those individuals he talks to which give him information.

Sweigert was asked why he recently moved to Indiana. Sweigert said he is unemployed and sold his houses to do his research. Sweigert mentioned [REDACTED] in New York, New York. He also had one daughter in Oregon.

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Sweigert believes most of his financial problems started when he was involved in a protest in Portland, Oregon against Mr. McCabe. It involved an investigation of [REDACTED]. Sweigert's life has not been the same and he believed that things started to fall apart as a result of his protest involvement. Sweigert stated that the Portland Christmas Tree Bomb Plot incident and subsequent protest was a turning point in his life. Sweigert was [REDACTED] in 1999. He has a good relationship with is [REDACTED]. Her name is [REDACTED]. He believes she lives in Lake Grove, OR or Lake Oswego, OR.

Sweigert was asked why his sources report to him. Sweigert said his sources had a distrust of the US Government. The sources do not trust the authorities anymore. Sweigert referenced former FBI Director Mueller

[REDACTED]

Continuation of FD-302 of (U) Interview of George Webb Sweigert , On 06/15/2017 , Page 5 of 7

giving immunity to McCabe and others. Sweigert said he is a Bernie Sanders fan, but believes people are railroading President Trump.

Sweigert was asked how long he had been investigating. Sweigert said he was on day 230 of his timeline. He then said he first went to the FBI in 2013 when he requested a FOIA.

Sweigert was asked why he was in Zanesville, Ohio. Sweigert said he was in Zanesville to meet a contact of his. The contacts name is [REDACTED] b6
[REDACTED] is a former law enforcement member that then became a b7C
[REDACTED] with the State of Ohio State Health Insurance. [REDACTED] helped Sweigert connect the dots in the past. Sweigert then referenced he was traveling around meeting with 20 of his investigators. Sweigert said he had 1,000 regular contributors. Sweigert had traveled to Toronto, Montreal, Minnesota, Wisconsin, and other states.

Sweigert had announced on Youtube that he would be traveling to Zanesville, Ohio. At that time, a source contacted him requesting to meet. He mentioned he had received a note from a female the night of June 14, 2017 while in Zanesville, Ohio. Sweigert was under the impression that he would get information from the female and her husband which would help solve the Pike County, Ohio murder of the Roden family. He opined that she could also be providing information about illegal cigarette shipping by the Clinton County Sheriff's Office, but admittedly did not know the nature of the information that would be provided. He stated that when [REDACTED] dropped him off at his hotel after dinner at "The Barn" b6
restaurant in Zanesville, he found a post it note on his car with b7C
instructions to "follow me". He followed a white Toyota Corolla or similar vehicle and parked at a location signaled by the car's driver. He then waited for over an hour to meet his source, but was approached by Zanesville Police before he could meet.

Sweigert's goal is to uncover corruption and terrorism. Sweigert does not want information to be put into an FBI system and have nothing else happen with the information. Sweigert referenced "Doctrine of Misprison." Sweigert believes the doctrine follows the thinking of, If the government does not act, then the people must act.

Sweigert mentioned he spoke with the United States Coast Guard three times on the evening of June 14, 2017. He spoke with the Coast Guard after one of his followers had reported the info on the Maersk Memphis. The second call was from a Border Patrol agent which was doing the sweep for bombs for the Coast Guard. On the final call that Sweigert received, he spoke with a group of individuals from a task force. He said he was on speaker phone and 35 people were asking him questions.

[REDACTED]

Continuation of FD-302 of (U) Interview of George Webb Sweigert , On 06/15/2017 , Page 6 of 7

Sweigert did not call the information on the Maersk Memphis in himself because it was raw intelligence. Sweigert did not want to incite panic. He said his information was real time similar to a news room. Sweigert said the information was put together by his followers and himself to realize the dirty bomb was there. It was put together like 1+1=2. He thought the call might have been made by someone named [REDACTED] (sic), but was not sure. Sweigert referenced a book written by Dr. Jerome Corsi regarding dirty bombs as having information that contributed to their assessment.

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Sweigert then referenced an article titled "what could go wrong?" discussing "Gulftainer." This is in reference to a corporation out of the UAE which controls Port Canaveral. This corporation is attempting to gain control of 43 other ports. The head of the corporation is the lead scientist for the Pakistani Nuclear Program. Sweigert asked people to check the Bill of Lading on ships to and from Pakistan.

Sweigert's six sources, [REDACTED] and his five sources, reported an attack was imminent. Sweigert received a call from his source around 6:00 PM or 7:00 PM on June 14, 2017. Sweigert was at the "Mother Trucker" gas station in Zanesville, Ohio when he received the call. Sweigert verbally agreed to let the interviewing agents search his phone for the phone number of his source. Sweigert refused to sign a consent form unless a member of the FBI Joint Terrorism Task Force (JTTF) helped him with his charges in Zanesville, Ohio. Sweigert stated that he highly respects the FBI and believed that he was helping law enforcement with his investigative work.

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Sweigert knew about the [REDACTED] brothers and the [REDACTED] brothers shipping business and felt he had to say something. Sweigert did not tell his followers to call the FBI, Coast Guard, or other law enforcement. He mentioned the Maersk Memphis was at the Port of Kareem in Pakistan one month ago. And the ship was later in Mumbai.

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Sweigert believes the [REDACTED] brothers are working with a [REDACTED] [REDACTED] is a known drug dealer in Mumbai according to Sweigert. Sweigert believes [REDACTED] is responsible for the Mumbai bombings in 1993 and the Mumbai Hotel attack. Sweigert said [REDACTED] intimidates border agents in order to smuggle his shipments. Sweigert believes the [REDACTED] brothers are the intelligence part of a partnership with [REDACTED] is the logistics part of the partnership.

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Sweigert mentioned he is under surveillance by the FBI. He has been under surveillance since the McCabe protest. Sweigert continually referenced the JTTF and the Counter Intelligence field. Sweigert believes he has information which can help if the JTTF will help him.

[REDACTED]

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Continuation of FD-302 of (U) Interview of George Webb Sweigert , On 06/15/2017 , Page 7 of 7

Sweigert had no further questions or information. He was thanked for his time and the interview was concluded.

It should be noted as the interviewing agents exited the interview room Zanesville Police Department personnel had received a phone call. The phone call was in regard to Sweigert and his criminal charges. The caller identified their self as [REDACTED] of the National Investigative Reporting Agency. [REDACTED] said he was Sweigert's boss. The number [REDACTED] used to call was [REDACTED]

It should also be noted copies of the Zanesville Police Department reports will be kept in an FD-340/1A envelope.

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From:

To:

Subject:

Date:

Thursday, June 15, 2017 10:57:44 AM

ALCON,

This email is being forwarded to your attention for your situational awareness.

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-----Original Message-----

~~For Official Use Only~~

Good Morning MOTR Colleagues,

The following information is sent for your awareness only. No MOTR action/coordination is requested.

(EXHIBIT D)

IN THE UNITED STATES DISTRICT
COURT FOR THE EASTERN
DISTRICT OF VIRGINIA
Alexandria Division

ROBERT DAVID STEELE, et al.,)	
)	
Plaintiffs,)	
)	
v.)	Civil Action No. 1:20-cv-01140(RDA/IDD)
)	
JASON GOODMAN,)	
)	
Defendant.)	
_____)	

ORDER

This MATTER is before the Court on non-party D. George Sweigert's Motion for Leave to Intervene Pursuant to Rule 24(a) [Dkt. No. 4] (hereinafter "Motion"). This matter can be resolved without oral argument, as such argument would not aid the decisional process. It is hereby

ORDERED that the Motion is **DENIED**. The Motion is denied because Intervenor-Applicant Sweigert failed to meet the requirements for both intervention of right and permissive intervention under Rule 24.

The Court must permit a person to intervene if a federal statute affords him the right unconditionally or if he claims an interest in the subject matter of the case and his interest would not be adequately represented by existing parties. *See* FED. R. CIV. P. 24(A). The movant cites no statute or legal authority that would provide him a cause of action as an intervenor. *See* Fed. R. Civ. P. 24(a)(1). The movant also lacks an interest in the subject matter of this case. On September 28, 2020, Plaintiffs Robert David Steele and his nonprofit filed a Complaint against Defendant Jason Goodman for, among other things, defamation and

unauthorized use of Steele's name and picture. Compl. at 1, Dkt. No. 1. Plaintiffs seek an injunction to permanently enjoin and order Goodman to cease and desist from any further use of Steele's name and picture and to remove such from Defendant's online videos, tweets, blogs and posts. Dkt. No. 7 ¶1. Sweigert claims to have an interest in the litigation because the complaint mentions him. Dkt. No. 4 ¶4. However, paragraph 50 of the Complaint, the only place where Sweigert is mentioned, describes a video Plaintiffs allege Defendant produced and the footnote to the paragraph merely identifies Sweigert as one of the people besides Steele whose photoshopped image was depicted in the video. Compl. ¶50. This is insufficient for Sweigert to establish an interest in the case. *See Steele v. Goodman*, 2019 U.S. Dist. LEXIS 124571, *18, 2019 WL 3366556 (E.D. Va. July 25, 2019) (a passing mention in the complaint does not establish a connection between the harm Plaintiffs allege and the harm Sweigert alleges). Sweigert has not established that he has an interest in the online posts targeted at Steele or in Steele's claims. Furthermore, a final judgment in Steele's action will not impair Sweigert's ability to pursue independent claims against Goodman.

The movant, likewise, fails to meet the requirements for permissive intervention. The Court may permit a person to intervene in an action if he has, pursuant to a federal statute, a conditional right to intervene or has a claim that overlaps with the action based on "common question of law or fact." *See* FED. R. CIV. P. 24(B). Like Steele, Sweigert claims that Defendant Goodman has defamed him through Internet videos and social media posts. Dkt. No. 4 at ¶i. Sweigert and Steele may have similar causes of action against Goodman, but that does not mean the movant may intervene in a case that is strictly about false and defamatory statements allegedly published by Goodman about Steele. "To the extent that Sweigert's claims seem 'identical' to Steele's, the claims relate to two distinct sets of conduct or statements: those

directed at Plaintiffs and those directed at Sweigert.” *Steele*, 2019 U.S. Dist. LEXIS 124571, *18. The facts underlying both claims of defamation differ. *Id.* at *24. In their memorandum in opposition to the Motion, Plaintiffs argue that they have no relationship, business or personal, with Sweigert, and they have no knowledge or involvement with the defamation allegedly perpetrated by the Defendant against the movant. Dkt. No. 7 ¶5, footnote 1. Sweigert likewise argues there is no relationship between him and Plaintiffs. Dkt. 4, ¶5. Thus, movant fails to establish a common question of law or fact.

Sweigert notes that during previous litigation involving Steele and Goodman, Defendant defamed him over social media with claims that Sweigert is an operative of Steele’s. Sweigert seeks status as a “limited plaintiff for the primary purposes of obtaining a legal determination from this Court that,” since June 14, 2017, “the movant has had nothing to do with any business, litigation, operations, or any other such activity” with Plaintiffs. Dkt. No. 4 ¶5. No allegations have been made in this case that Sweigert is connected to Steele. Dkt. No. 7 ¶7. Movant essentially seeks an advisory opinion from the Court concerning his involvement in a previous case or an advisory opinion concerning claims that are not the subject of litigation and would thus have no effect. The Court will not provide an advisory opinion. “A federal court has neither the power to render advisory opinions nor ‘to decide questions that cannot affect the rights of litigants in the case before them.’” *Ragan v. Vosburgh*, No. 96-2621, No. 96-2687, No. 96-2739, 1997 U.S. App. LEXIS 6626, at *13 (4th Cir. Apr. 10, 1997).

ENTERED this 5th day of November 2020.

/s/ Ivan D. Davis

Ivan D. Davis
United States Magistrate Judge

Alexandria, Virginia

(EXHIBIT E)

Redbubble.com
111 Sutter St, 17th fl
San Francisco, CA
94104 USA

November 28, 2018

COUNTER NOTICE Re: Removal of Crowdsourc the Truth Art

Dear Redbubble.com,

I, Jason Goodman, am the owner of Crowdsourc the Truth and the Redbubble.com account of that same name. I am writing in response to the recent removal of two items from the Crowdsourc the Truth Redbubble.com print on demand store. The items in question are:

Deep State Dunces

<https://www.redbubble.com/people/csthetruth/works/29102359-deep-state-dunces>



Iran Contra Crazies

<https://www.redbubble.com/people/csthetruth/works/29394927-iran-contra-crazies>



I consider this a very serious matter as it deals directly with the first amendment right to freedom of speech, freedom of the press as well as important elements of the Digital Millennium Copyright Act and other laws including Fair Use and Parody. This complaint also seeks to circumvent matters currently under consideration by the U.S. District Court in the Southern District of New York in pending civil litigation.

1:18-cv-08653-VEC Sweigert v. Goodman

Valerie E. Caproni, presiding

Date filed: 09/21/2018

Date of last filing: 11/26/2018

Crowdsource the Truth is a U.S. based news, commentary, op-ed and information analysis education and entertainment multimedia network.

https://www.youtube.com/channel/UC8Cl9QaRtuW9CNjP7pP4BBQ?view_as=subscriber

Our video programs are frequently accompanied by political photo-cartoons and comedic photo collages which include depictions of the political figures, newsmakers, celebrities and individuals we discuss on the show. Our contributors include journalists, legal experts, criminal investigators, authors, commentators, political figures, celebrities and members of the general public.

The complainant, David Sweigert (aka D. George Sweigert, aka Dave Acton) has engaged in two separate frivolous civil suits specifically directed toward chilling the journalistic efforts of Jason Goodman, the owner of the Redbubble.com account in question. Both of these civil suits have been stymied in court because they are based on meritless claims and are considered Strategic Lawsuits Against Public Participation (SLAPP lawsuits). This is a dubious practice of bringing legal action in the form of civil lawsuits and filing claims to chill the free speech of the target of the complaint. In one of the suits, an Anti SLAPP counterclaim has been filed. Your legal department can view this on Pacer.gov <https://ecf.vaed.uscourts.gov/doc1/18918801049>

3:17-cv-00601-MHL Steele et al v. Goodman et al

M. Hannah Lauck, presiding

Date filed: 09/01/2017

Date of last filing: 09/06/2018

In the other suit, the Plaintiff (Sweigert) has been ordered by the Federal District Court for the Southern District of New York to cease from entering further pleadings and is bound by an as yet unanswered Judge's Order to Show Cause. His complaint to Redbubble.com has arrived coincidentally just after this order was issued and is an obvious attempt at further punitive action outside the court system. It should be further noted that this complaint to Redbubble.com is a clear defiance of the spirit and intent of the Federal Judge's pending Order to Show Cause. Remedying the complaint via removal of the artwork could in fact embroil Redbubble.com in the ongoing civil action in U.S. District Court in the Southern District of New York.

It should be further noted, despite the fact that this artwork has been present on Redbubble.com for nearly one year, Sweigert has only chosen to act AFTER the Judge's refusal to accept his complaint demanding a court order for the removal of items from Redbubble.com. This is clearly an effort on Sweigert's part to circumvent the spirit and intention of the Judge's standing order. One might infer that Sweigert was motivated to contact Redbubble.com to achieve this outcome now that it is becoming increasingly clear that Sweigert's baseless complaints are being rendered moot by the Federal Courts in which they are under consideration.

In further defiance of the spirit and intent of the order from the Federal Judge, on November 27, 2018, Sweigert published a video on YouTube in which he boasts of his plans to take further punitive action against Goodman and directly references Redbubble.com's compliance with his illicit demand. I would reiterate that the removal of this artwork from Redbubble.com is a matter directly in question in the pending federal civil suit and it is very important that Redbubble.com not get involved in any arbitration or decision making in this matter until the suit is settled and a final order issued by the court.

On these grounds, I would humbly request Redbubble.com reinstate these graphic elements and return Jason Goodman's Redbubble.com account to its previous status, restoring the account to its condition prior to Sweigert's vindictive and unfounded demand. Redbubble.com should ignore any communications from Sweigert absent a court order in the pending case.

Your legal department can refer to all of the 70 + pleadings in the case on Pacer.gov, via the link below, alternately I can provide all the documentation if required.

https://ecf.nysd.uscourts.gov/cgi-bin/HistDocQry.pl?461218112993504-L_1_0-1

The individuals depicted in each of these graphic images are clearly defined as limited purpose public figures. According to USLegal.com and other widely accepted legal definitions.xxx

Public Figure Law and Legal Definition

A public figure is a person of great public interest or fame, such as a politician, celebrity, or sports hero. The term usually used in the context of libel and defamation actions, where the standards of proof are higher if the party claiming defamation is a public figure and therefore has to prove disparaging remarks were made with actual malice.

A person may also be considered a "limited purpose" public figure by having thrust themselves to the forefront of particular public controversies in order to influence the resolution of the issues involved. The determination is made on a case-by-case basis, taking the particular facts into account.

The individual who filed the grievance with Redbubble.com is David George Sweigert. (aka D.George Sweigert, aka Dave Acton) Sweigert is a professional actor, and often appears under his stage name Dave Acton.

<https://casting360.com/portfolio/?view=1108109>
<https://youtu.be/G3Q8KTIJPHc?t=1920>

The screenshot shows a YouTube video player interface. The video is titled "Contrail" and is from the channel "Infowars". The video has 1.13k total views, 2 comments, and 9 likes. The video is currently at 32:00 / 1:12:13. The video content shows a man wearing a headset and speaking into a microphone, with the text "INFOWARS.COM" overlaid on the bottom right of the video frame.

Contrail
 Contrail, also called condensation trail or vapour trail, streamer of cloud sometimes observed behind an airplane flying in clear cold humid air. It forms upon condensation of water vapour produced by the combustion of fuel in airplane engines. When the ambient relative humidity is high, the resulting ice-crystal plume may last several hours. The trail may be distorted...
 Encyclopedia Britannica

Infowars Nightly News 2012-09-05 Wednesday - David Acton
 1,131 views

tb Videolytics
 SUMMARY
 1.13k Total Views, 2 Comments, 9 Likes, 3 Dislikes
 SEO
 0 of 20 suggested videos are from this creator
 This video's tags appear 23 times in title and description
 This video has (click to load) search results for its tags
 SOCIAL
 0 Likes, 0 Upvotes, 0 Mentions
 CHANNEL
 1.76M Views, 2.69k Subscribers, 888 Videos
 BEST PRACTICES
 X High Res. Thumbnail, X Info Cards Added, X End Screen Added, X Shared on Twitter, X Liked on Facebook, X Comment Pinned, X Comment Hearted, X Captions Added
 TAGS
 wednesday, september, 5th, 2012, astonisher, astonisher1, astonisher2, wordpress, infowars, prison, planet, tv, nightly, news, the, alex, jones, show, special, report, channel, drudge, prisonplanet.tv, infowars.com, infowarsnews.com, u.s., constitution, founding, fathers, declaration, of, independence, dollar

This individual has appeared on Television, in films and almost daily throughout the internet on social media channels including YouTube. His YouTube channel Acton the Actor, currently redtitled "Prepper Kitty News" offers daily commentary on current events, politics, law, hoax "news" events and his as yet unresolved civil suit against Jason Goodman among other topics.

<https://www.youtube.com/user/ActontheActor>

The screenshot shows the YouTube channel page for 'Prepper Kitty News', which has 18,223 subscribers. The channel banner features a woman in a car with the text 'PREPPER KITTY NEWS' overlaid. The left sidebar includes navigation links for Home, Trending, Subscriptions, and Originals, as well as a Library section with History, Watch later, Purchases, and Sunday With Char... The channel's 'Uploads' tab is selected, showing three recent videos:

- George Webb loves George Soros disses Julian Assange and his cat**: 323 views • 7 hours ago. Meow Mix Op Ed.
- Defango Alert -- Defango Alert -- Defango Alert**: 424 views • 13 hours ago. Defcon Alert.
- George Webb oil man catches moldy spores in Bakersfield**: 280 views • 15 hours ago. Julian Assange Cat Rescue Team advised.

One of his most recent video productions is a clip in which he boasts of his “victory” in the removal of the artwork from Redbubble.com and promises additional legal action in the state of Arizona (in defiance of the spirit and intent of the court order currently in full force and effect from the Federal Judge in the Southern District of New York). It is exceedingly important that Redbubble.com NOT intervene or otherwise interfere with the pending process of this civil suit.

The screenshot shows a YouTube video player with the URL https://www.youtube.com/watch?v=1p349EOm_C4&t=63s. The video content displays a search result for "Deep State Dunces" with the text: "Uh oh. 0 results for 'Deep State Dunces'. Check your spelling. If that doesnt work, try something new." The video player includes standard controls like play/pause, volume, and a progress bar showing 1:05 / 2:21.

On the right side, the 'Videalytics' panel provides analytics for the video:

- SUMMARY**: 523 Total Views, 24 Comments.
- SEO**: 3 of 20 suggested videos are from this video's tags appear 0 times. This video has 0 search results for...
- SOCIAL**: 0 Likes, 0 Upvotes.
- CHANNEL**: 141k Views, 18.2k Subscribers.
- BEST PRACTICES**: Loading Best.
- TAGS**: No Tags.
- Up next**: A video titled 'George Soros c' by 'Prepper Kitty News'.

Additionally, Sweigert has boldly interfered in criminal proceedings in the state of Arizona in the pending case of an individual name Michael J Barden. Barden has appeared on Crowdsourcing the Truth as an interview subject with regard to his criminal charges. Sweigert's interference in this criminal case is currently under investigation and Barden has stated his intention to enter a pleading requesting the court issue Sweigert yet another Order to Show Cause as to why he is contacting officers of the court and interfering in the criminal proceedings with which Sweigert has no direct involvement.

As a public figure in the political and social media sphere, Sweigert's permission is not needed for the creation of 1st amendment protected political parody or artistic commentary involving depictions of Sweigert as outlined in the Fair Use clause of the Digital Millennium Copyright Act. The Fair Use clause of the DMCA states:

Fair Use

There is a doctrine in the United States copyright law called "Fair Use" which allows people to use your content without your permission. Fair Use is now widely accepted in most countries around the world. It allows the limited use of copyrighted material without requiring permission from the copyright owner. Items considered Fair Use would be commentary, criticism, news reporting, research, teaching or scholarship. It provides for the legal, non-licensed citation or incorporation of copyrighted material in another author's work under a four-factor balancing test. To read the US Copyright law section which specifically references Fair Use [click here](#)

It references four factors to measure fair use. They are:

1. the purpose and character of the use, including whether such use is of a commercial nature or is for nonprofit educational purposes;
2. the nature of the copyrighted work;
3. the amount and substantiality of the portion used in relation to the copyrighted work as a whole; and
4. the effect of the use upon the potential market for or value of the copyrighted work.

Since the use of the photographic image of Sweigert's face is a matter under consideration by the Federal District Court in the Southern District of New York, and since that matter remains undecided at present, Sweigert has no authority to demand the removal of this image from Redbubble.com and Redbubble.com should DENY his demands to comply with such a request.

It is of paramount importance that Redbubble.com remain out of the vindictive legal battle initiated by Sweigert and allow the court in the Southern District of New York to issue its order before any action is taken.

I would kindly and humbly request Redbubble.com restore the artwork to its previous state and insist that Sweigert's claims be backed by a court order from the court in which this proceeding is currently underway. Any other action aside from restoration of the artwork, on the part of Redbubble.com would be wholly inappropriate while this matter is still pending adjudication.

Under penalty of perjury, I have a good faith belief that the material was removed or disabled as a result of mistake or misidentification of the material to be removed or disabled. The complainant had no right to demand removal for the reasons detailed above. I consent to the jurisdiction of the Federal District Court, San Francisco County, California, United States and I

will accept service of process from the person who provided notification described above or an agent of such person.

Thank you for your kind consideration and prompt cooperation.

A handwritten signature in black ink, appearing to be 'JG' followed by a horizontal line.

Jason Goodman
252 7th Avenue #6s
New York, NY 10001
truth@crowdsourcethetruth.org
212-244-8585

(EXHIBIT F)

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- [Gifts for Them](#)
- [Gifts on a Budget](#)

- [Explore designs](#)

Explore designs ☐

Account

Sales History



Sales History – Sales by Work

- [Sales by Time](#)
- [Payment History](#)
- [When do I get paid?](#)

Work	Qty	Margin	Tax
Crowdsource The Truth Logo Gear	42	US\$197.13	US\$0.89
Blind Justice CSTT	14	US\$91.29	US\$0.00
The Podfather	17	US\$82.91	US\$0.00
Podfather Logo	10	US\$59.33	US\$1.59
Cap'n Scrunch	8	US\$39.65	US\$0.00
The Great Fortel Tarot	4	US\$29.75	US\$0.00
Hack to the Future	8	US\$24.09	US\$0.75
Mr. Trump Goes To Washington	7	US\$23.80	US\$0.30
Deep State Dunces	7	US\$22.91	US\$0.30
The Usual Suspects	6	US\$21.99	US\$0.30
The Russians Are Coming! The Russians Are Coming!	6	US\$18.84	US\$0.20
Secret Policeman's Charity Ball	4	US\$15.82	US\$0.00
Fraudster Island	3	US\$12.91	US\$0.00
The Great Fortel	3	US\$12.88	US\$0.00
The Hudson Report - Criminal Congress	4	US\$12.32	US\$0.00
The Big Liebowksi	3	US\$11.61	US\$0.31
Mission TrumPossible	2	US\$7.46	US\$0.31
Imran the Telephone Receptionist	2	US\$6.70	US\$0.00
School of Crock	2	US\$6.64	US\$0.00
Swindler's List	2	US\$6.64	US\$0.00

No So... Absolutely Fabulous	2	US\$6.19	US\$0.00
Thug Life - Bill & Imran	1	US\$5.62	US\$0.00
The Wizard of Lies	1	US\$5.49	US\$0.00
Lord of the Crime Rings	1	US\$4.88	US\$0.00
Better Call Gowen	1	US\$4.39	US\$0.00
What's Next for Andrew McCabe?	1	US\$3.75	US\$0.00
Willy Clinton and the Fraud Factory	1	US\$3.35	US\$0.00
Imran Arrested	1	US\$3.32	US\$0.00
	163	US\$741.66	US\$4.95

ARTIST TOOLS

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- [Shop Settings](#)
- [Share your work](#)
- [Protect your work](#)
- Beta
- [Product Pricing](#)
- [Google Analytics](#)
- [Sales History](#)
- [Payment History](#)
- [Message to Buyer](#)
- [Link to Other Sites](#)

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